

CLARK COUNTY
DEPARTMENT OF AIR QUALITY AND
ENVIRONMENTAL MANAGEMENT
500 South Grand Central Parkway, Box 555210, Las Vegas, Nevada 89155
Part 70 Operating Permit
Source: 75
Issued in accordance with the
Clark County Air Quality Regulations (AQR)

ISSUED TO: LASCO BATHWARE

SOURCE LOCATION:

201 N. Meadow Valley Road
Moapa Valley, Nevada 89025
T14S, R66E, Section 29
Hydrographic Area: 218

COMPANY ADDRESS:

Lasco Bathware
8101 E Kaiser Boulevard, Suite 200
Anaheim, CA 92808

NATURE OF BUSINESS:

SIC Code 3089 – Plastic Bathware Manufacturing
NAICS: 326199 – Bathroom and toilet accessories, plastic manufacturing

RESPONSIBLE OFFICIAL:

Name: Steve Dowler
Title: Plant Manager
Phone: (714) 993-1220
Fax Number: (714) 524-8784

SOURCE CONTACTS:

Viktor Prismantas: (714) 993-1220, (702) 864-2100

Part 70 Operating Permit Issuance Date: September xx, 2008

Part 70 Operating Permit Expiration Date: September xx, 2013

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

Tina Gingras
Assistant Director, Clark County DAQEM

EXECUTIVE SUMMARY

Lasco is a bathware manufacturing operation located at 201 N. Meadow Valley Road, Moapa, NV. The legal description of the location of the source is as follows: a portion of Section 29, T14S, R66E, in Moapa Valley, County of Clark, State of Nevada. Lasco is situated in hydrographic area 218 (California Wash). California Wash is designated as unclassified non-attainment area for 8-hour ozone (regulated through NO_x and VOC) and is PSD area for PM₁₀, CO and SO_x. Lasco is a major source for HAP and is minor for all other regulated air pollutants. Bathware fixtures at Lasco are produced in continuous assembly lines by laminating a mixture of thermosetting plastic resin and other inert materials onto a bathware mold. The finished products are often referred to as Fiber Reinforced Polyester (FRP). Lasco is subject to 40 CFR 63 Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Composites Production. The source is required to meet 95 percent overall reduction of HAP emissions based on the Maximum Achievable Control Technology (MACT) standards under the subpart and it meets the requirements by using rotary preconcentrators and RTO as add-on control devices. This Part 70 Operating Permit is issued based on the Title V Renewal application submitted on December 29, 2006.

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I. ACRONYMS

Table I-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulations
AST	Aboveground Storage Tank
ATC	Authority to Construct Certificate or Authority to Construct
ATC/OP	Authority to Construct/Operating Permit
Bhp	Brake Horsepower
BCC	Clark County Board of County Commissioners
CAO	Field Corrective Action Order
CE	Control Efficiency
CEM	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
EPA	United States Environmental Protection Agency
EU	Emission Unit
EVR	Enhanced Vapor Recovery
GDO	Gasoline Dispensing Operation
HAP	Hazardous Air Pollutant
HP	Horse Power
MACT	Maximum Achievable Control Technology
MMBtu	Millions of British Thermal Units
NAC	Nevada Administrative Code
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
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RTO	Regenerative Thermal Oxidizer
scf	Standard Cubic Feet
SIP	State Implementation Plan
SO _x	Sulfur Oxides
TCS	Toxic Chemical Substance
TSD	Technical Support Document
UST	Underground Storage Tank
USGS	United States Geological Survey
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid

II. GENERAL CONDITIONS

ALL CONDITIONS IN THIS PERMIT ARE FEDERALLY ENFORCEABLE UNLESS EXPLICITLY DENOTED OTHERWISE. [AQR 19.4.2]

1. This operating permit has a fixed term not to exceed five (5) years. The Part 70 permit issuance date is the beginning of the permit term. [AQR 19.4.1.2]
2. The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of AQR, Nevada law and the Clean Air Act (Act), and is grounds for enforcement action; for permit termination, suspension, reopening, or amendment; or for denial of a permit renewal application. [AQR 19.4.1.6.a]
3. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid. [AQR 19.4.1.5]
4. The permittee shall pay all permit fees. Permit fees, including annual emission fees, shall be determined pursuant to AQR Section 18. [AQR 19.4.1.7]
5. The permit does not convey any property rights of any sort, or any exclusive privilege. [AQR 19.4.1.6.d]
6. The permittee shall not hinder, obstruct, delay, resist, interfere with, or attempt to interfere with, the Control Officer, or any individual to whom authority has been duly delegated by the AQR, for the performance of any duty. [AQR 5.1]
7. The permittee owning, operating, or in control of any equipment or property who shall cause, permit, or participate in any violation of the AQR shall be individually and collectively liable to any penalty or punishment imposed by and under the AQR. [AQR 8.1]
8. It shall be a defense to any prosecution instituted against any employee of a person owning, operating, or conducting any business, industry, or operation that the acts complained of were done and performed pursuant to the orders and directions of such owner or operator, or his agent or representative, conducting such business, industry or operation. [AQR 8.2]
9. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for the permit modification, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [AQR 19.4.1.6.c]
10. The permittee shall continue to comply with applicable requirements for which the permittee is in compliance. [AQR 19.3.3.8.b]
11. The permittee shall meet applicable requirements that become effective during the term of this permit in a timely manner. [AQR 19.3.3.8.c and 19.4.3.3]
12. If the permittee failed to submit any relevant facts or submitted incorrect information in a permit application, they shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit [AQR 19.3.2]

13. The permittee may request confidential treatment of any records in accordance with AQR Section 19 and 40 CFR 2.301. The Administrator and the Control Officer shall each retain the authority to determine whether information is eligible for confidential treatment on a case-by-case basis. *[AQR 19.3.1.3 and 40 CFR 2.301]*
14. The permittee shall not make a modification, as defined in AQR Section 0, to the existing source prior to receiving an Authority to Construct Certificate (ATC) from the Control Officer. *[AQR 12.1.1.1]*
15. Any request for a permit modification must comply with the requirements of AQR Section 19. *[AQR 19.5.5.1]*
16. The permittee shall not build, erect, install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission, which would otherwise constitute a violation of the AQR. This condition shall not apply to cases of AQR Section 40. *[AQR 80.1 and 40 CFR 60.12]*
17. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit, provided the source conforms to the applicable requirements of AQR Sections 12 and 58. *[AQR 19.4.1.11]*
18. For purposes of permit renewal, the permittee shall submit a timely and complete application. A timely application is one submitted between six (6) months and eighteen (18) months prior to the date of permit expiration. *[AQR 19.3.1.1.c]*
19. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application has been submitted consistent with AQR Subsections 19.3.1.1.c and 19.5.2 in which case the permit shall not expire and all terms and conditions of the permit shall remain in effect until the renewal permit has been issued or denied. *[AQR 19.5.3.2]*
20. The permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Control Officer copies of 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 19.4.1.6.e]*
21. The permittee shall allow the Control Officer or an authorized representative, upon presentation of credentials:
 - a. entry upon the permittee's premises where the Part 70 source is located, or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
 - b. access to inspect and copy, at reasonable times, any records that must be kept under conditions of the permit;
 - c. access to inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

- d. access to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. *[AQR 4.3 and 19.4.3.2]*
22. Upon request of the Control Officer, the permittee shall provide such information or analyses as will disclose the nature, extent, quantity or degree of air contaminants which are or may be discharged by such source, and type or nature of control equipment in use, and such disclosures be certified by a professional engineer registered in the state. In addition to such report, the Control Officer may designate an authorized agent to make an independent study and report as to the nature, extent, quantity or degree of any air contaminants which are or may be discharged from source. An authorized agent so designated is authorized to inspect any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.4]*
23. Upon request of the Control Officer, the permittee shall test or have tests performed to determine the emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of that allowed by the applicable regulations is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. The Control Officer shall be given a copy of the test results in writing and signed by the person responsible for the tests. *[AQR 4.5]*
24. Upon request of the Control Officer, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. *[AQR 4.6]*
25. The permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the terms and conditions of this permit. *[AQR 19.4.1.6.b]*
26. Any person who violates any provision of this operating permit, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry or monitoring activities or any requirements by the Control Officer is guilty of a civil offense and shall pay civil penalty levied by the Hearing Board of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1]*
27. Any person aggrieved by an order issued pursuant to AQR Section 9 is entitled to review as provided in NRS Chapter 233B *[AQR 9.12]*
28. permittee shall comply with the requirements of 40 CFR 61, Subpart M, of the National Emission Standard for Asbestos for all demolition and renovation projects. *[AQR 13.1.7]*
29. Requirements for compliance certification with terms and conditions contained in the operating permit, including emission limitations, standards, or work practices, are as follows *[AQR 19.4.3.5]*:
 - a. compliance certifications shall be submitted annually in writing to the Control Officer and the Administrator at USEPA Region IX by the permittee. A compliance certification is due on January 30 of each year;
 - b. compliance shall be determined in accordance with the requirements detailed in AQR 19.4.1.3, record of periodic monitoring, or any credible evidence; and

- c. the compliance certification shall include:
 - i. identification of each term or condition of the permit that is the basis of the certification;
 - ii. the source's compliance status and whether compliance was continuous or intermittent;
 - iii. methods used in determining the compliance status of the source currently and over the reporting period consistent with Subsection 19.4.1.3; and
 - iv. other specific information required by the Control Officer to determine the compliance status of the source.
30. The permittee shall report to the Control Officer any upset, breakdown, malfunction or emergency, as defined in Section 0, which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit, within one (1) hour of the onset of the event. [AQR 25.2]
31. An emergency, as defined in AQR Section 0, can constitute an affirmative defense to actions brought for noncompliance with a technology-based standard provided the properly signed contemporaneous operating logs or other relevant evidence demonstrate:
 - a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. the permitted source was properly operated during claimed emergency;
 - c. the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit during the period of the emergency; and
 - d. the permittee submitted notice of the emergency to the Control Officer within one (1) hour of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. [AQR 19.4.7.1]
32. The permittee shall include a certification of truth, accuracy, and completeness by a responsible official when submitting any application form, report, or compliance certification pursuant to this operating permit. This certification and any other certification required shall state, "Based on the information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." This statement shall be followed by the signature and printed name of the responsible official certifying compliance and the date of signature. [AQR 19.3.4]

III. SOURCE-WIDE PTE SUMMARY

[Authority for all values, limits, and conditions in this section: NSR ATC/OP, Modification 4, Revision 2, Section II (10/25/06)]

The source potential to emit (PTE) for pollutants, as presented in Table III-1 establishes the major source status of the source.

Based upon the source-wide PTE, this stationary source is major for HAP.

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

PM ₁₀	NO _x	CO	SO ₂	VOC	HAP
0.50	6.83	2.61	0.07	49.21	45.66

IV. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. EMISSION UNITS

The stationary source covered by this Part 70 Operating Permit (OP) is defined to consist of the emission units and associated appurtenances summarized in Table IV-A-1. *[NSR ATC/OP Modification 4, (10/25/06), AQR 19.2.1 and 19.3.3.3]*

Table IV-A-1: List of Emission Units (EU)

EU	Description	SCC	Type ¹
A01	Spray Booth (Line 1) with Preconcentrator and RTO. Lasco Custom Design, S/N A07501	30800724	SC1
A02	Air Heater (Line 1, 6.3 MMBtu/hr) Hasting SBD-233-EC750, S/N 47514-2	30890004	F1
A04	Spray Booth (Line 1) with Preconcentrator and RTO. Lasco Custom Design, S/N A07504	30800724	SC1
A05	Spray Booth (Line 1) with Preconcentrator and RTO. Lasco Custom Design, S/N A07505	30800724	SC1
A06	Air Heater (Line 1, 4.8 MMBtu/hr) Hasting SBD-277-EC500, S/N 45716-1	30890004	F1
A07	Spray Booth (Line 1) with Preconcentrator and RTO. Lasco Custom Design, S/N A07507	30800724	SC1
A08	Grinding Booth (Line 1), Lasco Custom Design, S/N A07508	30800701	P1
A09	Spray Booth (Line 2) with Preconcentrator and RTO. Lasco Custom Design, S/N A07509	30800724	SC1
A10	Air Heater (Line 2, 6.3 MMBtu/hr) Hasting SBD-233-EC750, S/N 47514-2	30890004	F1
A11	Spray Booth (Line 2) with Preconcentrator and RTO. Lasco Custom Design, S/N A07511	30800724	SC1
A12	Air Heater (Line 2, 4.8 MMBtu/hr) Hasting SBD-277-EC500, S/N 45716-1	30890004	F1
A13	Spray Booth (Line 2) with Preconcentrator and RTO. Lasco Custom Design, S/N A07513	30800724	SC1
A14	Five Cure Tunnel Air Heaters (Line 2, 5.0 MMBtu/hr total) Eclipse RM-100, 0.99 MMBtu/hr each	30890004	DM
A15	Spray Booth (Line 2) with Preconcentrator and RTO. Lasco Custom Design, S/N A07515	30800724	SC1
A17A	Trim Saw (2 units) with Recirculating Dust Collector. S/N A07517	30800701	DM
A20	Air Heater (Line 1, 0.36 MMBtu/hr) Hasting SBD-112-EC-40	30890004	DM
A21	Autocon/Myer Mixer, S/N Las3	30501223	DM
A22	Myer Mixer, S/N 800A-20-1180	30501223	DM
A23	Storage Silo (CaCO ₃) High Pneu-Con	30501222	S2
A24	Holding Tank Room (Lam 2 & 3)	30800799	P1

EU	Description	SCC	Type ¹
A25	Holding Tank Room (BC and Lam 1)	30800799	P1
A26	Gelcoat Room, Line 1	30800799	DM
A27	Gelcoat Room, Line 2	30800799	DM
A30	Part Demold, Line 1 & 2	30800799	DM
A31	Mold Preparation, Line 1	30800799	P1
A35	Mold Preparation, Line 2	30800799	P1
A36	Inspection	30800799	DM
A37	Part Repair	30800799	DM
A38	Virgin Resin Storage Tank	30501222	DM
A39	Myer Putty Mixer	30501223	DM
A40	Protective Coating Booth	30800703	P1
A42	Preconcentrators and Regenerative Thermal Oxidizer (RTO) AIREX Corporation, S/N #2278-25ORTO-2064, Operating Temperature: 1,600-1,700 °F	30800799	DM

¹ Billing code is a designation for emission unit billing purposes: P1 = Process equipment; SC1 = Surface coating; S2 = Storage silo. DM = 'deminimus' (unit has negligible emissions or is not subject to an annual fee). Fees are listed in AQR Section 18.

B. EMISSION LIMITATIONS AND STANDARDS

1. Emission Limits

- a. Neither the actual nor allowable emissions from each emission unit shall exceed the calculated potential to emit (PTE) listed in Tables IV-B-1, IV-B-2, IV-B-3, and IV-B-4. [NSR ATC/OP Modification 4, Condition II-B (10/25/06)]

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

EU	Control ¹	Operation (hrs/yr)	PM ₁₀	NO _x	CO	SO ₂	VOC incl HAP	HAP
A01	Precon+RTO	8,760	Included in Emissions from RTO					
A02	None	2,200	0.03	1.06	0.14	0.01	0.04	0.02
A04	Precon+RTO	8,760	Included in Emissions from RTO					
A05	Precon+RTO	8,760	Included in Emissions from RTO					
A06	None	2,200	0.02	0.81	0.11	0.01	0.03	0.01
A07	Precon+RTO	8,760	Included in Emissions from RTO					
A08	None	8,760	0.15	0.00	0.00	0.00	0.00	0.00
A09	Precon+RTO	8,760	Included in Emissions from RTO					
A10	None	2,200	0.03	1.06	0.14	0.01	0.04	0.02
A11	Precon+RTO	8,760	Included in Emissions from RTO					
A12	None	2,200	0.02	0.81	0.11	0.01	0.03	0.01
A13	Precon+RTO	8,760	Included in Emissions from RTO					
A14	None	2,200	0.02	0.81	0.11	0.01	0.03	0.01
A15	Precon+RTO	8,760	Included in Emissions from RTO					
A17A	99 %	8,760	0.01	0.00	0.00	0.00	0.00	0.00
A20	None	2,200	0.01	0.06	0.01	0.01	0.01	0.01
A21	Precon+RTO	8,760	Included in Emissions from RTO					

EU	Control ¹	Operation (hrs/yr)	PM ₁₀	NO _x	CO	SO ₂	VOC incl HAP	HAP
A22	Precon+RTO	8,760	Included in Emissions from RTO					
A23	99 %	8,760	0.01	0.00	0.00	0.00	0.00	0.00
A24	Precon+RTO	8,760	Included in Emissions from RTO					
A25	Precon+RTO	8,760	Included in Emissions from RTO					
A26	Precon+RTO	8,760	Included in Emissions from RTO					
A27	Precon+RTO	8,760	Included in Emissions from RTO					
A30	None	8,760	0.00	0.00	0.00	0.00	0.00	0.00
A31	Precon+RTO	8,760	Included in Emissions from RTO					
A35	Precon+RTO	8,760	Included in Emissions from RTO					
A36	None	8,760	0.00	0.00	0.00	0.00	0.00	0.00
A37	None	8,760	0.00	0.00	0.00	0.00	1.00	1.00
A38	None	8,760	0.00	0.00	0.00	0.00	0.10	0.10
A39	Precon+RTO	8,760	Included in Emissions from RTO					
A40	None	8,760	0.00	0.00	0.00	0.00	3.30	0.00
A42	RTO	8,760	0.20	2.22	1.98	0.01	44.63	44.48

¹ Precon+RTO: 100% capture by permanent total enclosure and 95% overall control by preconcentrators and RTO.

Table IV-B-2: Fuel Burning Equipment PTE (pounds per hour)¹

EU	Rating (MMBtu/hr)	PM ₁₀	NO _x	CO	SO ₂	VOC incl. HAP	HAP
A02	6.30	0.03	0.96	0.13	0.01	0.03	0.02
A06	4.80	0.02	0.73	0.10	0.01	0.03	0.01
A10	6.30	0.03	0.96	0.13	0.01	0.03	0.02
A12	4.80	0.02	0.73	0.10	0.01	0.03	0.01
A14	5.00	0.02	0.77	0.10	0.01	0.03	0.01
A20	0.36	0.01	0.06	0.01	0.01	0.01	0.01
A42	(RTO) ²	0.05	0.78	0.47	0.01	14.84	14.83

¹ Emissions based on AP 42- Propane fuel, Commercial Boiler (<10 MMBtu/hr).

² RTO emissions are based on fuel usage, heat value of process air and overall capture and control efficiency of 95%. NO_x emissions are based on the May 2006 performance test.

Table IV-B-3: PTE of Emission Units Not Controlled by RTO (pounds per hour)

EU	Control	PM ₁₀	NO _x	CO	SO ₂	VOC incl. HAP	HAP
A08	None	0.82	0.00	0.00	0.00	0.00	0.00
A17A	99%	0.05	0.00	0.00	0.00	0.00	0.00
A23	99%	0.05	0.00	0.00	0.00	0.00	0.00
A30	None	0.00	0.00	0.00	0.00	0.00	0.00
A36	None	0.00	0.00	0.00	0.00	0.00	0.00
A37	None	0.00	0.00	0.00	0.00	0.34	0.34
A38	None	0.00	0.00	0.00	0.00	0.03	0.03
A40	None	0.00	0.00	0.00	0.00	1.13	0.00

Table IV-B-4: Combined PTE of Preconcentrators and RTO (A42)¹

EU	PM ₁₀		NO _x		CO		SO ₂		VOC incl HAP		HAP	
	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr
Precon+RTO	0.05	0.20	0.78	2.22	0.47	1.98	0.01	0.01	14.84	44.63	14.83	44.48

¹Emissions from two Preconcentrators and the RTO occur through two stacks.

- b. Unless otherwise noted, all emission units at the source, including the RTO, the air heaters, and the binvent on storage silo (A23), shall comply with the opacity standard of 20 percent as determined by conducting observations in accordance with EPA Method 9. *[AQR 12.8.1(c)]*

2. Production Limits

- a. Each air heater at the source shall be limited to operate up to 2,200 hours per year. *[NSR ATC/OP Modification 4, Condition III-A-2 (10/25/06)]*
- b. Styrene usage from the application of styrene-containing resins such as gelcoat, laminate and barriercoat shall exceed neither 1,290 lbs per hour, based on a daily average, nor 4,645 tons per year (rolling 12 month total). Maximum styrene content of each resin shall be limited as required by Condition IV-B-3(g). *[NSR ATC/OP Modification 4, Condition III-A-3 (10/25/06)]*
- c. Use of propane fuel by all fuel burning equipment other than the RTO shall be limited to 662,645 gallons per year (rolling 12 month total). *[NSR ATC/OP Modification 4, Condition III-A-4 (10/25/06)]*
- d. The RTO shall not use more than 193,596 gallons (including startups and idling) of propane per year (rolling 12 month total) for the oxidation of process air from the source. *[NSR ATC/OP Modification 4, Condition III-A-5 (10/25/06)]*
- e. Use of styrene-containing resins (polyester resin, gelcoat and barrier coat) for bathware manufacturing shall be limited to the spray booths in production Lines 1 and 2, which are equipped with permanent total enclosures and add-on control and the part repair area (EU: A37). *[NSR ATC/OP Modification 4, Condition III-B-1 (10/25/06)]*
- f. Styrene-containing resins shall be limited to a maximum styrene content less than or equal to 36 percent for gelcoat, 42 percent for barriercoat and 49 percent for laminate, by weight, as received. *[NSR ATC/OP Modification 4, Condition III-B-8 (10/25/06)]*

3. Emission Controls

- a. All spray booths and other emission units, identified in Table IV-B-1 to have 'Precon+RTO' as control, shall be designed to capture 100 percent emissions using a permanent total enclosure. The exhausts from these emission units shall be routed through preconcentrators and the RTO (A42). *[NSR ATC/OP Modification 4, Condition III-B-2 (10/25/06)]*
- b. The preconcentrators and the RTO shall be in operation at all times when the molding process for bathware manufacturing operation is being performed at the source. *[NSR ATC/OP Modification 4, Condition III-A-6 (10/25/06)]*
- c. The preconcentrators and the RTO shall be operated in such a way that the add-on control devices shall demonstrate a combined minimum control efficiency of 95 percent. *[NSR ATC/OP Modification 4, Condition III-B-3 (10/25/06)]*

- d. Preconcentrators and the RTO shall be operated according to the Operation and Maintenance manual. A copy of the O&M manual shall be kept in the RTO control room or must be made available on-site for inspection. [NSR ATC/OP Modification 4, Condition III-B-6 (10/25/06)]
- e. The RTO shall be operated at a temperature between 1,600 °F and 2,000 °F (averaged over 10 minutes). The RTO shall be equipped with a low temperature alarm (Allen Bradley PLC) whose set point is the minimum operating temperature of 1,600 °F). [NSR ATC/OP Modification 4, Condition III-B-4 (10/25/06)]
- f. The temperature monitoring device for the RTO shall be installed and operated as specified in 40 CFR 63.988. [AQR 12.8]
- g. Controls shall be set to ignite propane fuel to recover the dropped temperature if the low temperature alarm goes off (below 1,600 °F). An interlock with the air supply shall be installed to prevent operation of the spray guns if the RTO temperature drops below the 1,600 °F. Any such incident shall be recorded. [NSR ATC/OP Modification 4, Condition III-B-5 (10/25/06)]
- h. The preconcentrators shall be maintained at a desorption temperature above 275 °F to ensure complete regeneration of the adsorbent.
- i. All practical measures shall be taken to contain any fugitive emission from the material transferring and handling of bathware units. [NSR ATC/OP Modification 4, Condition III-B-7 (10/25/06)]
- j. All resins and materials containing regulated air pollutants shall be stored in closed containers. [NSR ATC/OP Modification 4, Condition III-B-10 (10/25/06)]
- k. The particulate emissions from all grinding and trimming operations shall be controlled by dust collectors/filter media, and the control devices shall be maintained as per the manufacturer's specifications. A copy of the manufacturer's specification shall be kept on site. [NSR ATC/OP Modification 4, Condition III-B-11 (10/25/06)]
- l. The binvent on storage silo (A23) shall be used to control particulate emissions at all times the silo is in operation. [NSR ATC/OP Modification 4, Condition III-B-13 (10/25/06)]
- m. The binvent on storage silo (A23) shall have a particulate control efficiency of at least 99 percent. [NSR ATC/OP Modification 4, Condition III-B-14 (10/25/06)]
- n. An effective seal shall be required around the binvents and the binvent shall be maintained as specified by the manufacturer. [NSR ATC/OP Modification 4, Condition III-B-15 (10/25/06)]
- o. A preventative maintenance schedule that is consistent with the binvent manufacturer's instructions for routine and long-term maintenance shall be developed and followed. A copy of the maintenance schedule shall be kept on site. [NSR ATC/OP Modification 4, Condition III-B-18 (10/25/06)]
- p. The permittee must comply with the above control requirements. If there is inconsistency between standards or requirements, the most stringent standard or requirements shall apply. [NSR ATC/OP Modification 4, Condition III-B-19 (10/25/06)]

C. MONITORING

- 1. The permittee shall continuously monitor operating temperature of the RTO, to assure compliance with the oxidation efficiency. The data shall be recorded based on 10 minutes average. [AQR 12.8 and AQR 19.4.1.3]

2. The permittee shall continuously monitor the desorption temperature of the preconcentrator, to assure compliance with the emission limitation. The data shall be recorded based on 10 minutes average. *[AQR 12.8 and AQR 19.4.1.3]*
3. Daily visual observations of the binvents shall be made to verify that visible emissions are not present. If they are, the permittee shall cease operations producing the emissions until the problem is corrected. *[AQR 12.8 and AQR 19.4.1.3]*
4. Monthly visual inspection shall be made of the binvent for air leaks. Defective components shall be repaired or replaced within five working days of the discovery of the malfunction. Should the malfunction cause the binvent to be ineffective in controlling particulate emissions, the processing of material shall cease until such repairs to the binvent are completed. *[AQR 12.8 and AQR 19.4.1.3]*
5. The permittee shall perform daily visual emissions inspection by an individual trained in Method 9 to verify compliance with the opacity limit set forth in Condition IV-B-1-b. Corrective actions shall be immediately taken and recorded should the daily inspection find emission units exceeding applicable opacity standards. *[AQR 19.4.1.3 and 40 CFR 70.6]*
6. The permittee shall demonstrate initial compliance with organic HAP emission limits specified in this permit using the procedures shown in Table 8 of 40 CFR 63, Subpart WWWW. *[AQR 12.8 and AQR 19.4.1.3]*
7. The permittee shall demonstrate initial compliance with work practice standards using the procedures shown in Table 9 of 40 CFR 63, Subpart WWWW. *[AQR 12.8 and AQR 19.4.1.3]*
8. The permittee shall demonstrate continuous compliance with all organic HAP emission limits in 40 CFR 63, Subpart WWWW that the source shall meet using add-on control, except during startup, shutdown and malfunction. *[AQR 12.8 and AQR 19.4.1.3]*
9. The permittee shall maintain a written start-up, shut-down and malfunction plan according to the provisions in 40 CFR 63.6(e)(3). A copy of the plan shall be kept on site. *[AQR 19.4.1.3]*

D. TESTING

1. The permittee shall conduct performance tests, performance evaluations, design evaluations, capture efficiency testing and other initial compliance demonstrations required by 40 CFR 63, Subpart WWWW, in accordance with 40 CFR 63, Subpart SS and §63.5850. *[AQR 12.8 and AQR 19.4.1.3]*
2. To demonstrate 100 percent capture efficiency for spray booths and other emission units at the source identified in Table IV-B-1 as part of the permanent total enclosure (identified to have 'Precon+RTO' as control), the permittee shall conduct a performance test utilizing Method 204 in Appendix M of 40 CFR Part 51. *[AQR 12.8 and AQR 19.4.1.3]*
3. A performance test to estimate the overall removal efficiency of the preconcentrator-RTO system for VOC emissions from Lines 1 and 2 and other emission units identified in Table IV-B-1 as part of the permanent total enclosure (identified to have 'Precon+RTO' as control) shall be performed by testing the inlet and outlet of the preconcentrator-RTO system in accordance with 40 CFR 63, Subpart SS, and §63.5850. The performance test shall also demonstrate compliance with the emission limitations specified in this permit. *[AQR 12.8 and AQR 19.4.1.3]*

4. All actual emission calculations for organic HAP emissions shall be performed using actual monitored and recorded operating parameters. Emission factors shall be verified during the initial performance test. *[AQR 12.8 and AQR 19.4.1.3]*
5. Performance testing shall also be subject to the following general conditions: *[AQR 12.8 and AQR 19.4.1.3]*
 - a. Performance testing is subject to 40 CFR 60 and DAQEM Guideline on Performance Testing. Performance testing shall be the initial instrument for determining compliance with emission limitations set forth in this permit, and 40 CFR 63, Subpart SS and Subpart WWWW.
 - b. Performance tests to demonstrate compliance with the capture efficiency requirement of the permanent total enclosure, utilizing Method 204 in Appendix M of 40 CFR Part 51, shall be conducted annually.
 - c. Performance tests to demonstrate compliance with minimum control efficiencies and emission limits for the preconcentrators and the RTO, in accordance with 40 CFR 63, Subpart SS, and §63.5850, shall be conducted annually.
 - d. Performance tests to demonstrate compliance with minimum control efficiencies and emission limits for the preconcentrators and the RTO shall be conducted when any production line restarts production after a period of shut down lasting more than six months. The performance tests shall be conducted within 60 days after achieving maximum production but no later than 180 days after the restart of production.
 - e. The permittee shall submit for approval a performance testing protocol which contains test, reporting, and notification schedules, test protocols, and anticipated test dates to the Control Officer and to the Enforcement Office of the US EPA, Region IX, at least 45 days prior to the anticipated test date but not more than 90 days prior to the anticipated test date.
 - f. A report describing the results of the performance test shall be submitted to the Control Officer, Compliance Division, DAQEM and to the Enforcement Office of the US EPA, Region IX, within 60 days from the end of the performance test.
 - g. The permittee of any stationary source or emissions unit that fails to demonstrate compliance with the emissions standards or limitations during any subsequent performance test shall submit a compliance plan to the Control Officer within 90 days from the end of the performance test. *[AQR 10]*
 - h. Additional performance testing may be required by the Control Officer. *[AQR 4.5]*

E. RECORD KEEPING

1. The permittee shall comply with all notification, record keeping and reporting requirements of 40 CFR 63.10, and 40 CFR 63 Subpart WWWW. The permittee shall maintain records showing, at a minimum: *[AQR 12.8 and AQR 19.4.1.3]*
 - a. the magnitude and duration of excess emissions, notifications, monitoring system performance, startup, shutdown and malfunction. corrective action taken and other records as required by 40 CFR 63.10;
 - b. daily hours of operation of spray booths, preconcentrators and the RTO;
 - c. styrene content of all gelcoats, barriercoat, laminates and other raw materials used on a daily basis;

- d. amount of all gelcoats, barriercoat, laminates and other raw materials used on a daily basis with monthly and rolling 12 month total;
 - e. amount and VOC/HAP content of all materials used for mold preparation (cleaner, sealer and polymer release agent) on a monthly basis;
 - f. amount and VOC/HAP content of all materials used for protective coatings on a monthly basis with rolling 12 month total;
 - g. monthly and rolling 12 month total consumption of propane gas for the RTO;
 - h. monthly and rolling 12 month total consumption of propane gas for the source;
 - i. records of preconcentrators and RTO maintenance;
 - j. records of binvent inspections and maintenance;
 - k. continuous temperature recording of RTO operation according to Condition IV-C-1;
 - l. continuous records of preconcentrator desorption temperature according to Condition IV-C-2;
 - m. results of daily and monthly visible emission observations;
 - n. filter media weekly inspection results and maintenance activities; and
 - o. performance tests results.
2. All records, logs, etc. shall be made available to the Control Officer upon request. *[AQR 12.8 and AQR 19.4.1.3]*
 3. Records of monthly and annual purchases and inventory of resins, other VOC and HAP containing materials used in the manufacturing process, and propane fuel shall be kept by the permittee and provided to the Control Officer upon request. *[AQR 12.8 and AQR 19.4.1.3]*
 4. Records and data required by this permit and maintained by the permittee may be audited, at the source's expense, at any time by a third party selected by the Control Officer. *[AQR 12.8]*
 5. All records and logs, or a copy thereof, shall be kept on-site for a minimum of five (5) years from the date the measurement or data was entered. *[AQR 19.4.1.3]*

F. REPORTING

1. The permittee shall comply with all notification, record keeping and reporting requirements of 40 CFR 63.10, and 40 CFR 63 Subpart WWWW. *[AQR 12.8 and AQR 19.4.1.3]*
2. The permittee shall submit quarterly reports to the Control Officer. *[AQR 12.8 and AQR 19.4.1.3]*
3. Each quarterly report shall: *[AQR 12.8 and AQR 19.4.1.3]*
 - a. include, as the first page of text, a signed certification containing the sentence, "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate and complete." This statement shall be signed and dated by a responsible official of the company;
 - b. include a summary of items listed in Conditions IV-B-1-a through m;

- c. include quarterly summaries of any permit deviations;
 - d. be based on the calendar quarter (including partial calendar quarters);
 - e. be submitted within 30 days after the end of the calendar quarter; and
 - f. be addressed to the attention of the Control Officer.
4. 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-D-1. [AQR 12.8 and AQR 19.4.1.3]

Table IV-D-1: Reporting Schedule

Quarter	Applicable Period	Due Date ¹	Required Contents
1	January, February, March	April 30 Each year	Quarterly Report for 1st Calendar Quarter
2	April, May, June	July 30 Each year	Quarterly Report for 2nd Calendar Quarter
3	July, August, September	October 30 Each year	Quarterly Report for 3rd Calendar Quarter
4	October, November, December	January 30 Each year	Quarterly Report for 4th Calendar Quarter,
5	Calendar Year	January 30 Each year	Annual Compliance Certification Report

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

- 5. Lasco shall submit a written report of failures to comply with any permit condition, including failures attributable to upset/breakdowns, within fifteen (15) days of discovery. Such reporting shall describe the probable cause of such non-compliance and any corrective actions or preventive measures taken. [AQR 19.4.1.3]
- 6. 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 19.4.1.3]
- 7. The annual emissions inventory shall be submitted by March 31 to the DAQEM Compliance Reporting Supervisor and shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even if that unit was not operated. [AQR 12.8 and AQR 19.4.1.3]

G. MITIGATION

The source has no federal offset requirements.

V. OTHER REQUIREMENTS

- 1. The permittee shall, under all conditions, operate the source in a manner consistent with safety and good air pollution control practice for minimizing emissions as required by 40 CFR 63.6. [AQR 19.4.1.3]

**ATTACHMENT 1
 APPLICABLE REGULATIONS**

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE:

1. Nevada Revised Statutes (NRS), Chapter 445B
 2. Clark County Air Quality Regulations (CCAQR)
- Applicable CCAQR Sections:**

Citation	Title
CCAQR Section 0 [amended 10/7/04]	Definitions
CCAQR Section 4 [amended 7/1/04]	Control Officer
CCAQR Section 11 [amended 7/1/04]	Ambient Air Quality Standards
CCAQR Section 12.1 [amended 10/7/04]	General application requirements for construction of new and modified sources of air pollution
CCAQR Section 12.2.5 [amended 10/7/04]	Requirements for specific air pollutants: PM ₁₀ emission source located in the PSD area
CCAQR Section 12.2.6 [amended 10/7/04]	Requirements for specific air pollutants: CO sources located in the PSD area
CCAQR Section 12.2.16 [amended 10/7/04]	Requirements for specific air pollutants: SO ₂ sources located in the PSD area
CCAQR Section 12.2.18 [amended 10/7/04]	HAP Sources in Clark County
CCAQR Section 12.5 [amended 10/7/04]	Air Quality Models
CCAQR Section 13.1.7 [amended 10/7/04]	National Emission Standard for Asbestos
CCAQR Section 16 [amended 7/1/04]	DAQEM Operating Permits
CCAQR Section 17 [amended 7/1/04]	Dust Control Permit for Construction Activities Including Surface Grading and Trenching
CCAQR Section 18 [amended 1/20/05]	Permit and Technical Service Fees
CCAQR Section 19 [amended 7/1/04]	40 CFR Part 70 Operating Permits
CCAQR Section 20.1.1 Subpart A [amended 7/1/04]	Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) –General Provisions
CCAQR Section 25 [amended 7/1/04]	Upset/Breakdown, Malfunctions
CCAQR Section 26 [amended 7/1/04]	Emissions of Visible Air Contaminants
CCAQR Section 27 [amended 7/1/04]	Particulate Matter from Process Weight Rate
CCAQR Section 28 [amended 7/1/04]	Fuel Burning Equipment
CCAQR Section 40 [amended 7/1/04]	Prohibition of Nuisance Conditions
CCAQR Section 41 [amended 7/1/04]	Fugitive Dust

Citation	Title
CCAQR Section 42 [amended 7/1/04]	Open Burning
CCAQR Section 43 [amended 7/1/04]	Odors in the Ambient Air
CCAQR Section 49 [amended 7/1/04]	Emission Standards for Boilers and Steam Generators Burning Fossil Fuels
CCAQR Section 55.5 [adopted 12/21/04]	Preconstruction review for New or Modified Stationary Sources in the 8-Hour Ozone Nonattainment Area
CCAQR Section 70.4 [amended 7/1/04]	Emergency Procedures

3. Clean Air Act, as amended (CAAA), Authority: 42 U.S.C. § 7401, et seq

4. Title 40 of the Code of Federal Regulations (40 CFR)

Applicable 40 CFR Subsections:

Citation	Title
40 CFR Part 52.1470	SIP Rules
40 CFR Part 63, Subpart A	National Emissions Standards for Hazardous Air Pollutants for Source Categories(NESHAP) – General Provisions
40 CFR Part 63, Subpart WWWW	National Emissions Standards for Hazardous Air Pollutants for Source Categories(NESHAP) - Reinforced Plastic Composites Production
40 CFR Part 63 Subpart SS	National Emissions Standards for Hazardous Air Pollutants for Source Categories(NESHAP)- National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR Part 51	Appendix M Method 204 or equivalent