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PART 70 OPERATING PERMIT

SOURCE ID: 75

Aquatic Co.
201 North Meadow Valley Road
Moapa, Nevada 89025

ISSUED ON: March 27, 2020

EXPIRES ON: March 26, 2025

REVISED ON: November 17, 2021

Current action: Reopening for Cause

Issued to:

Aquatic Co.
P.O. Box 310
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Responsible Official:

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NATURE OF BUSINESS:

SIC code 3088, "Plastic Plumbing Fixtures"
NAICS code 326199, "All Other Plastics Product Manufacturing"

Issued by the Clark County Department of Environment and Sustainability in accordance with Section 12.5 of the Clark County Air Quality Regulations.

Theodore A. Lendis, Permitting Manager

EXECUTIVE SUMMARY

Aquatic Co. is a bathware manufacturing operation located at 201 North Meadow Valley Road, Moapa, Nevada. This is the only source owned and operated by Aquatic Co. in the state of Nevada. 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. Aquatic Co. is situated in Hydrographic Area 218 (California Wash). California Wash is in attainment for all regulated air pollutants. Aquatic Company is a major source of HAP and therefore, it is a major Part 70 source. The source also emits greenhouse gasses. The source is not a categorical stationary source as defined in AQR 12.2.2(j).

Major structures at Aquatic Co.'s Moapa source include one production and warehouse building (168,000 sq. ft.) including an office building, two production lines, a resin mixing/storage area, four large aboveground tanks, and a propane fuel tank. All Aquatic Co. products are produced with thermosetting plastic resins modified with inert fillers and reinforced with glass fiber, wood strips, and other stiffening materials. Aquatic Co.'s operation is open molding with mechanical resin application. The finished products are often referred to as Fiber Reinforced Polyester (FRP).

The source emits styrene, a hazardous air pollutant (HAP) as well as volatile organic compounds (VOC), and minor amounts of particulate matter and combustion byproducts. The source is subject to 40 CFR Part 63 Subpart WWWW; "National Emission Standards for Hazardous Air Pollutants: Reinforced Composites Production". The source is also subject to 40 CFR Part 63 Subpart SS; "National Emission Standards for Closed Vent Systems, Control Devices & Routing to Fuel Gas Systems, Recovery Devices and Routing to a Fuel Gas System or a Process". This subpart applies to the RTO add-on control device on the manufacturing lines.

The source potential to emit (PTE) is shown in the table below:

Source PTE (tons per year)

Pollutant	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAP	H ₂ S	Pb	GHG
Source Total	0.69	0.51	9.47	3.18	0.24	49.42	45.67	0	0	6,025

DAQ received the Title V renewal application on September 19, 2018. There have been no equipment or operational changes since the last Part 70 Operating Permit. Based on information submitted by the applicant and a technical review performed by the DAQ staff, DAQ proposes the issuance of a renewed Part 70 Operating Permit to Aquatic Co.

Pursuant to AQR 12.5.2, all terms and conditions in Sections I through V and Attachment 1 through 4 of this permit are federally enforceable unless explicitly denoted otherwise.

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I. ACRONYMS

Table I-1: List of Acronyms and Abbreviations

Acronym	Term
AQR	Clark County Air Quality Regulation
ATC	Authority to Construct
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CD	control device
DAQ	Clark County Department of Air Quality
DOM	date of manufacture
dscf	dry standard cubic feet
dscm	dry standard cubic meter
EPA	U.S. Environmental Protection Agency
EU	emission unit
g/gr	gram
HAP	hazardous air pollutant
HOO	Hearing Officer Order
hp	horsepower
kW	kilowatts
MSP	Minor Source Permit
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standard
NSR	New Source Review
OP	Operating Permit
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PM ₁₀	particulate matter less than 10 microns in diameter
PSD	Prevention of Significant Deterioration
PTE	potential to emit
SIC	Standard Industrial Classification
SO ₂	sulfur dioxides
STL	Settlement Agreement
U.S.C.	United States Code
VMT	vehicle miles traveled
VOC	volatile organic compound

II. GENERAL CONDITIONS

A. GENERAL REQUIREMENTS

1. The permittee shall comply with all conditions of the Part 70 Operating Permit (OP). Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations (AQRs), Nevada law, and the Clean Air Act, and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a renewal application. *[AQR 12.5.2.6(g)(1)]*
2. 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 be unaffected and remain valid. *[AQR 12.5.2.6(f)]*
3. The permittee shall pay all permit fees pursuant to AQR 18. *[AQR 12.5.2.6(h)]*
4. This permit does not convey property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)]*
5. The permittee agrees to allow inspection of the premises to which this permit relates by any authorized representative of the Control Officer at any time during the permittee's hours of operation without prior notice. The permittee shall not obstruct, hamper, or interfere with any such inspection. *[AQR 4.1; AQR 5.1.1; AQR 12.5.2.8(b)]*
6. The permittee shall allow the Control Officer, upon presentation of credentials, to: *[AQR 4.1 & AQR 12.5.2.8(b)]*
 - a. Access and copy any records that must be kept under the conditions of the permit;
 - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
 - c. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements; and
 - d. Document alleged violations using such devices as cameras or video equipment.
7. Any permittee who fails to submit relevant facts, or who has submitted incorrect information in a permit application, shall, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary facts or corrected information. The permittee shall also provide any additional information necessary to address any requirements that become applicable to the source after it filed a complete application but before the release of a draft permit. A responsible official shall certify the additional information consistent with the requirements of AQR 12.5.2.4. *[AQR 12.5.2.2]*
8. Anyone issued a permit under AQR 12.5 shall post it in a location where it is clearly visible and accessible to facility employees and DAQ representatives. *[AQR 12.5.2.6(m)]*

B. MODIFICATION, REVISION, AND RENEWAL REQUIREMENTS

1. 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 Authority to Construct (ATC) from the Control Officer. *[AQR 12.4.1.1(a)]*
2. The permit may be revised, revoked, reopened and reissued, or terminated for cause by the Control Officer. The filing of a request by the permittee for a permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, does not stay any permit condition. *[AQR 12.5.2.6(g)(3)]*
3. A permit, permit revision, or renewal may be approved only if all of the following conditions have been met: *[AQR 12.5.2.10(a)]*
 - a. The permittee has submitted to the Control Officer a complete application for a permit, permit revision, or permit renewal (except a complete application need not be received before a Part 70 general permit is issued pursuant to AQR 12.5.2.20); and
 - b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of AQR 12.5.
4. 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 that would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR Part 60.12]*
5. 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. *[AQR 12.5.2.6(i)]*
6. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*
7. For purposes of permit renewal, a timely application is a complete application that is submitted at least six months, but not more than 18 months, prior to the date of permit expiration. If a source submits a timely application under this provision, it may continue operating under its current Part 70 OP until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

C. REPORTING, NOTIFICATIONS, AND INFORMATION REQUIREMENTS

1. The permittee shall submit all compliance certifications to the U.S. Environmental Protection Agency (EPA) and to the Control Officer. *[AQR 12.5.2.8(e)(4)]*
2. Any application form, report, or compliance certification submitted to the Control Officer pursuant to the permit or the AQRs, shall contain a certification by a responsible official, with an original signature, of truth, accuracy, and completeness. This certification, and any other required under AQR 12.5, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *[AQR 12.5.2.6(l)]*

3. The permittee shall furnish to the Control Officer, in writing and within a reasonable time, any information that the Control Officer may request to determine whether cause exists for revising, 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 that the permit requires keeping. The permittee may furnish records deemed confidential directly to the Administrator, along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)]*
4. Upon request of the Control Officer, the permittee shall provide any information or analyses that will disclose the nature, extent, quantity, or degree of air contaminants that are or may be discharged by the source, and the type or nature of control equipment in use. The Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to this report, the Control Officer may designate an authorized agent to make an independent study and report on the nature, extent, quantity, or degree of any air contaminants that are or may be discharged from the source. An agent so designated may examine any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.1]*
5. The permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1]*
 - a. The annual emissions inventory must be submitted to DAQ by March 31 of each calendar year (if March 31 falls on a Saturday or Sunday, or on a Nevada or federal holiday, the submittal shall be due on the next regularly scheduled business day);
 - b. The calculated actual annual emissions from each emission unit shall be reported even if there was no activity, along with the total calculated actual annual emissions for the source based on the emissions calculation methodology used to establish the potential to emit (PTE) in the permit or an equivalent method approved by the Control Officer prior to submittal; and
 - c. 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 (a sample form is available from DAQ).
6. Stationary sources that emit 25 tons or more of nitrogen oxide (NO_x) and/or 25 tons or more of volatile organic compounds (VOCs) during a calendar year from emission units, insignificant activities, and exempt activities shall submit an annual emissions statement for both pollutants. This statement must include actual annual NO_x and VOC emissions from all activities, including emission units, insignificant activities, and exempt activities. Emissions statements are separate from, and additional to, the calculated annual emissions reported each year for all regulated air pollutants (i.e., the emissions inventory report). *[AQR 12.9.1]*
7. 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 in order to maintain compliance with the conditions of this permit. *[AQR 12.5.2.6(g)(2)]*

D. COMPLIANCE REQUIREMENTS

1. Any person who violates any provision of the AQRs, 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 from DAQ is guilty of a civil offense and shall pay a civil penalty levied by the Air Pollution Control Hearing Board and/or the Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1; NRS 445B.640]*
2. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review, as provided in Chapter 233B of the NRS. *[AQR 9.12]*
3. The permittee shall comply with the requirements of Title 40, Part 61 of the Code of Federal Regulations (40 CFR Part 61), Subpart M—the National Emission Standard for Asbestos—for all demolition and renovation projects. *[AQR 13.1(b)(8)]*
4. The permittee shall certify compliance with the terms and conditions contained in this Part 70 OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. *[AQR 12.5.2.8(e)]*
5. The permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W. Russell Road, Suite 200, Las Vegas, NV 89118) and the Region 9 Administrator (Director, Air and Toxics Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each calendar year will be due on January 30 of the following year, and shall include the following: *[AQR 12.5.2.8(e)]*
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period. These methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR Part 70.6(a)(3). If necessary, the permittee shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information; and
 - c. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in Section II.D.6(b) of this permit. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance was required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.
6. The permittee shall report to the Control Officer any startup, shutdown, malfunction, emergency, or deviation that causes emissions of regulated air pollutants in excess of any limits set by regulations or this permit. The report shall be in two parts, as specified below: *[AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]*

- a. Within 24 hours of the time the permittee learns of the event, the permittee shall notify DAQ by phone at (702) 455-5942, by fax at (702) 383-9994, or by email at airquality@clarkcountynv.gov.
 - b. Within 72 hours of the required notification, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.
7. With the semiannual monitoring report, the permittee shall report to the Control Officer all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. [AQR 12.5.2.6(d)(4)(B)]
 8. The owner or operator of any source required to obtain a permit under AQR 12 shall report to the Control Officer emissions in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health and safety or the environment as soon as possible, but no later than 12 hours after the deviation is discovered, and submit a written report within two days of the occurrence. [AQR 25.6.2]

E. PERFORMANCE TESTING REQUIREMENTS

1. Upon request of the Control Officer, the permittee shall test (or have tests performed) to determine emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of those allowed by the AQRs 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. [AQR 4.2]
2. 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 4.2]
3. The permittee shall submit to the Control Officer for approval a performance testing protocol that contains testing, reporting, and notification schedules, test protocols, and anticipated test dates no less than 45 days, but no more than 90 days, before the anticipated date of the performance test unless otherwise specified in Section III.E of this permit. [AQR 12.5.2.8]
4. The permittee shall submit to EPA for approval any alternative test methods EPA has not already approved to demonstrate compliance with a requirement under 40 CFR Part 60. [40 CFR Part 60.8(b)]
5. The permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days of the end of the test. [AQR 12.5.2.8]

III. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. EMISSION UNITS

- The stationary source covered by this Part 70 OP is defined to consist of the emission units and associated appurtenances summarized in Table III-A-1. *[NSR ATC/OP Modification 4, Condition II-A (10/25/06) and Part 70 Revision, Condition III-A-1 (07/13/12) & AQR 12.5.2.3]*

Table III-A-1: List of Emission Units

EU	Description	Manufacturer	Model No.	Serial No.	Control Method
A01	Spray Booth; Line 1	Custom Design		A07501	Preconcentrator and RT0
A02	Air Heater; Line 1; 6.3 MMBtu/hr	Hasting	SBD-233	47514-2	
A04	Spray Booth; Line 1	Custom Design		A07504	Preconcentrator and RT0
A05	Spray Booth; Line 1	Custom Design		A07505	Preconcentrator and RT0
A06	Air Heater; Line 1; 4.8 MMBtu/hr	Hasting	SBD-227	47516-2	
A07	Spray Booth; Line 1	Custom Design		A07507	Preconcentrator and RT0
A08	Grinding Booth; Line 1	Custom Design		A07508	
A09	Spray Booth; Line 2	Custom Design		A07509	Preconcentrator and RT0
A10	Air Heater; Line 2; 6.3 MMBtu/hr	Hasting	SBD-233	48647	
A11	Spray Booth; Line 2	Custom Design		A07511	Preconcentrator and RT0
A12	Air Heater; Line 2; 4.8 MMBtu/hr	Hasting	SBD-227	59325	
A13	Spray Booth; Line 2	Custom Design		A07513	Preconcentrator and RT0
A14	Cure Tunnel Heaters (5); Line 2; 0.99 MMBtu/hr (each)	Eclipse	RM-100		
A15	Spray Booth; Line 2	Custom Design		A07515	Preconcentrator and RT0
A17A	Trim Saws (2)			A07517	Dust Collector
A20	Air Heater; Line 1; 0.36 MMBtu/hr	Hastings	SBD-112 (EC-40)		
A21	Mixer	Autocon/Myer		Las3	Preconcentrator and RT0
A22	Mixer	Myer		800A-20-1180	Preconcentrator and RT0
A23	Storage Silo (CaSO ₄)				Binvent
A24	Holding Tank Room (Lam 2 & 3)				Preconcentrator and RT0
A25	Holding Tank Room (BC and Lam 1)				Preconcentrator and RT0
A26	Gelcoat Room, Line 1				Preconcentrator and RT0
A27	Gelcoat Room, Line 2				Preconcentrator and RT0
A31	Mold Preparation, Line 1				Preconcentrator and RT0

EU	Description	Manufacturer	Model No.	Serial No.	Control Method
A35	Mold Preparation, Line 2				Preconcentrator and RTO
A37	Part Repair				
A38	Virgin Resin Storage Tank				
A39	Putty Mixer	Myer			Preconcentrator and RTO
A40	Protective Coating Booth				
A42	Preconcentrators and RTO Control Devices	AIREX Corporation		227825O RTO2064	
B01	Fire Pump	Patterson		94FP0732 8-L8	Turbocharger and Aftercooler
	Diesel Engine; 341 hp; DOM: 1994	Detroit Diesel	DDFPT6VT73 63F		

2. The units in Table III-A-2 are present at this source, but are insignificant activities pursuant to AQR 12.5.2.5. The emissions from these units or activities, when added to the PTE of the source, will not make the source major for any additional pollutant.

Table III-A-2: Summary of Insignificant Activities

Description
Part Demolding, Lines 1 and 2
(4) Noritz Hot Water Heaters, 0.236 MMBtu/hr, M/N: N-084M-DV
(2) State Hot Water Heaters, 0.199 MMBtu/hr, M/N: SBD100199PET

B. NONROAD ENGINES

Pursuant to Title 40, Part 1068.30 of the Code of Federal Regulations (40 CFR Part 1068.30), nonroad engines that are portable or transportable (i.e., not used on self-propelled equipment) shall not remain at a location for more than 12 consecutive months; otherwise, the engine(s) will constitute a stationary reciprocating internal combustion engine (RICE) and be subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ; 40 CFR Part 60, Subpart IIII; and/or 40 CFR Part 60, Subpart JJJJ. Stationary RICE shall be permitted as emission units upon commencing operation at this stationary source. Records of location changes for portable or transportable nonroad engines shall be maintained, and shall be made available to the Control Officer upon request.

Nonroad engines used on self-propelled equipment do not have this 12-month limitation or the associated recordkeeping requirements.

C. EMISSION LIMITATIONS AND STANDARDS

1. Emission Limits

- a. The permittee shall not allow actual emissions from the individual emission units to exceed the calculated PTE listed in Table III-C-1 in any consecutive 12-month period. *[NSR ATC/OP Modification 4, Condition II-B (10/25/06); Part 70 Revision, Condition III-B-1-a (07/13/12)]*

Table III-C-1: Emission Unit PTE, Including Startup, Shutdown and Malfunction (tons per year)

EU	Control ¹	Operation (hrs/yr)	PM ₁₀	PM _{2.5}	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	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	0.02	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	0.00
A09	Precon+RTO	8,760	Included in Emissions from RTO						
A10	None	2,200	0.03	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	0.02	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	0.02	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	0.00
A20	None	2,200	0.01	0.00	0.06	0.01	0.01	0.01	0.01
A21	Precon+RTO	8,760	Included in Emissions from RTO						
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	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	0.00
A31	Precon+RTO	8,760	Included in Emissions from RTO						
A35	Precon+RTO	8,760	Included in Emissions from RTO						
A37	None	8,760	0.00	0.00	0.00	0.00	0.00	1.00	1.00
A38	None	8,760	0.00	0.00	0.00	0.00	0.00	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	0.00	3.30	0.00
A42	RTO	8,760	0.20	0.20	2.22	1.98	0.01	44.63	44.48
B01		500	0.19	0.19	2.64	0.57	0.17	0.21	0.01

- b. The permittee shall not allow actual emissions from each emission unit to exceed the PTE listed in Table III-C-2. *[NSR ATC/OP Modification 4, Condition II-B (10/25/06)]*

Table III-C-2: Combined PTE of Preconcentrators and RTO, Including Startup, Shutdown and Malfunction (pounds per hour)¹

EU	Description	VOC incl. HAP	HAP
A42	RTO	14.84	14.83
Precon+RTO		14.84	14.83

¹ RTO emissions are based on fuel usage, heat value of process air and overall capture and control efficiency of 95% for VOC and HAPs. Emissions from two preconcentrators and the RTO occur through two stacks.

- c. The permittee shall meet the organic HAP emissions limits in Table 3 of 40 CFR Part 63 Subpart WWWW for all the open molding operations at the source, regardless of the quantity of HAP emitted. The applicable emission limits from Table 3 based on the operation types at the source is provided in Table III-C-3. *[40 CFR Part 63.5805(a)(2)]*

Table III-C-3: Applicable Emission Limits from Table 3 to 40 CFR Part 63 Subpart WWWW Based on the Operation Types at the Source

Line Item # From Table 3 to 40 CFR Part 63 Subpart WWWW	Operation Type	Application Type	Organic HAP Emissions Limit
2.a	open molding—non-corrosion-resistant and/or high strength (CR/HS)	mechanical resin application	88 lb/ton
3.a	open molding—tooling	mechanical resin application	254 lb/ton
6.a	open molding—gel coat	tooling gel coating	440 lb/ton
6.b	open molding—gel coat	white/off white pigmented gel	267 lb/ton
6.c	open molding—gel coat	all other pigmented gel coating	377 lb/ton

- d. 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. Operational Limits

Coatings

- a. The permittee shall limit the amount of styrene from the application of styrene-containing resins such as gelcoat, laminate and barriercoat to 1,290 lbs per hour, based on a daily average, and 4,645 tons per any consecutive 12-month period. *[NSR ATC/OP Modification 4, Condition III-A-3 (10/25/06)]*
- b. The permittee shall use styrene-containing resins (polyester resin, gelcoat and barrier coat) for bathware manufacturing only in the spray booths in production Lines 1 and 2 (EUs: A01, A04, A05, A07, A09, A11, A13, and A15), 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)]*

RTO/Manufacturing

- c. The permittee shall limit the operation of each air heater at the source to 2,200 hours per any consecutive 12-month period (EUs: A02, A06, A10, A12 and A20). *[NSR ATC/OP Modification 4, Condition III-A-2 (10/25/06)]*
- d. The permittee shall limit the use of propane fuel by all fuel burning equipment other than the RTO to 662,645 gallons per any consecutive 12-month period. *[NSR ATC/OP Modification 4, Condition III-A-4 (10/25/06)]*
- e. The permittee shall limit the amount of propane to 193,596 gallons per any consecutive 12-month period, including startups and idling, for the RTO (EU: A42) for the oxidation of process air from the source. *[NSR ATC/OP Modification 4, Condition III-A-5 (10/25/06)]*

Fire Pump

- f. The permittee shall limit the operation of the fire pump for testing and maintenance purposes to 100 hours per year. The permittee may operate the fire pump up to 50 hours per year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. The 50 hours per year for nonemergency situations cannot be used for peak shavings or to generate income for the source (EU: B01). *[40 CFR Part 63.6640(f)]*

3. Emission Controls

Coatings

- a. The permittee shall limit styrene-containing resins to a maximum styrene content of 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)]*
- b. The permittee shall store all resins and materials containing regulated air pollutants in closed containers. *[NSR ATC/OP Modification 4, Condition III-B-10 (10/25/06)]*

RTO/Manufacturing (EU: A42)/(A01, A04, A05, A07, A019, A11, A13, A15, A21, A22, A24 through A27, A31, A35, and A39)

- c. The permittee shall vent all exhaust from emission units through preconcentrators and the RTO and shall be 100 percent captured using a permanent total enclosure. *[NSR ATC/OP Modification 4, Condition III-B-2 (10/25/06)]*
- d. The permittee shall operate the preconcentrators and the RTO at all times when the molding process for bathware manufacturing is being performed at the source or when emissions are vented to them. *[40 CFR Part 63.988(a)(2) NSR ATC/OP Modification 4, Condition III-A-6 (10/25/06)]*
- e. The permittee shall operate the preconcentrators and the RTO in such a way that the add-on control devices demonstrate a combined minimum control efficiency of 95 percent. *[NSR ATC/OP Modification 4, Condition III-B-3 (10/25/06)]*
- f. The permittee shall operate the preconcentrators and the RTO according to the Operation and Maintenance (O&M) 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)]*
- g. The permittee shall operate the RTO 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. *[40 CFR Part 64, 40 CFR Part 63.988(c)(6), and NSR ATC/OP Modification 4, Condition III-B-4 (10/25/06)]*
- h. The permittee shall install a temperature monitoring device, capable of providing a continuous record for the RTO. Pursuant to 40 CFR Part 63 Subpart SS, the monitoring device shall be installed in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs. *[40 CFR Part 63.988, and 40 CFR Part 64]*
- i. The permittee shall interlock with the air supply to prevent operation of the spray guns if the RTO temperature is below 1,600 °F, including during startup, shutdown and malfunction. *[Part 70 OP Renewal Application, September 19, 2018]*

- j. The permittee shall set controls 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)]*
- k. The permittee shall maintain the preconcentrators at a desorption temperature above 275 °F to ensure complete regeneration of the adsorbent. *[40 CFR Part 64]*
- l. The permittee shall maintain the inlet air to the preconcentrators at a negative pressure (vacuum) of at least 1.5 inches of water column in order to assure 100 percent capture efficiency for emissions from units contained within the permanent total enclosure. *[40 CFR Part 64]*
- m. The permittee shall take all practical measures 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)]*
- n. The permittee shall control particulate emissions from all grinding and trimming operations with collectors/filter media. The control devices shall be maintained as per the manufacturer's specifications. A copy of the manufacturer's O & M manual shall be kept on site. *[NSR ATC/OP Modification 4, Condition III-B-11 (10/25/06)]*
- o. The permittee shall meet the work practice standards in Table 4 to 40 CFR Part 63 Subpart WWWW that apply for all the open molding operations at Aquatic Co., regardless of the quantity of HAP emitted. The applicable work practice standards based on the operation types at Aquatic Co. are listed in line items 2, 3, 6, 7, and 8 of Table 4 to the subpart and are described in detail below: *[40 CFR Part 63.5805(b)]*
 - i. For cleaning operations at the source, the permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
 - ii. For HAP-containing materials storage operations at the source, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
 - iii. For all mixing operations at the source, the permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
 - iv. For all mixing operations at the source, the permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95.0 percent efficient control device are exempt from this requirement.
 - v. For all mixing operations at the source, the permittee shall keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

Storage Silo (EU: A23)

- p. The permittee shall use the binvent on the storage silo (EU: A23) to control particulate emissions at all times the silo is in operation. *[NSR ATC/OP Modification 4, Condition III-B-13 (10/25/06)]*
- q. The permittee shall operate and maintain the binvent on storage silo (EU: A23) with a rated particulate control efficiency of at least 99.0 percent. *[NSR ATC/OP Modification 4, Condition III-B-14 (10/25/06)]*
- r. The permittee shall install an effective seal around the binvents and maintain the binvent as specified by the manufacturer. *[NSR ATC/OP Modification 4, Condition III-B-15 (10/25/06)]*
- s. The permittee shall develop and follow a preventative maintenance schedule that is consistent with the binvent manufacturer's O & M manual for routine and long-term maintenance. A copy of the maintenance schedule shall be kept on site. *[NSR ATC/OP Modification 4, Condition III-B-18 (10/25/06)]*

Fire Pump

- t. The permittee shall operate the diesel fire pump with a turbocharger and aftercooler (EU: B01). *[Part 70 Revision, Condition III-B-3-u (07/13/12)]*
- u. The permittee shall operate and maintain the diesel fire pump in accordance with the manufacturer's O & M Manual (EU: B01). *[Part 70 Revision, Condition III-B-3-v (07/13/12)]*
- v. The permittee shall maintain the diesel fire pump as follows, unless the manufacturer's O & M Manual requires something more stringent (EU: B01): *[40 CFR Part 63.6602]*
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - ii. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first; and
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Other

- w. The permittee shall operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR Part 63.6(e)(1)(i). *[40 CFR Part 63.5835(c)]*

D. MONITORINGVisible Emissions *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*

- 1. The permittee shall conduct daily visual emissions checks of the binvents (EU: A23) for visible emissions on all emissions units while in operation. *[AQR 12.5.2.6]*
- 2. The permittee shall conduct visual emissions of the emergency engine (EU: B01) for visible emissions on all emissions units while in operation, but no less frequently than monthly. *[AQR 12.5.2.6]*

3. If the permittee, during the visible emissions check, does not see any plume that, on an instantaneous basis, appears to exceed the opacity standard, then the observer shall keep a record of the name of the observer, the date on which the observation was made, the location, and the results of the observation. *[AQR 12.5.2.6]*
4. If the permittee sees a plume that, on an instantaneous basis, appears to exceed the opacity standard, the permittee shall: *[AQR 12.5.2.6]*
 - a. Take immediate action to correct causes of fugitive/stack emissions that appear to exceed allowable opacity limits; and
 - b. Have a certified observer take an EPA Method 9 observation of the plume and record the results, and take immediate action to correct causes of fugitive emissions in excess of allowable opacity limits in accordance with 40 CFR Part 60, Appendix A-4, "Test Methods 6 through 10B: Method 9—Visual Determination of the Opacity of Emissions from Stationary Sources."
5. Visible emissions checks do not require a certified observer, except where visible emissions appear to exceed the allowable opacity limit and exceed 30 seconds in duration, and an EPA Method 9 observation is made to establish it does not exceed the standard. *[AQR 12.5.2.6]*

Coatings

6. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used. Resin use records may be based on purchase records if the resin application method can be reasonably estimated. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. *[40 CFR Part 63.5895(c) and AQR 12.5.2.6]*
7. The permittee must demonstrate continuous compliance with each standard in 40 CFR Part 63.5805 that applies to the source according to the methods specified in paragraphs (a) through (c) of this section. *[40 CFR Part 63.5900(a) and AQR 12.5.2.6]*
 - a. Compliance with organic HAP emissions limits for sources using add-on control devices is demonstrated following the procedures in 40 CFR Part 63, Subpart SS.
 - b. Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 to 40 CFR Part 63 Subpart WWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in 40 CFR Part 63.5895(d).
 - c. Compliance with the work practice standards in Table 4 of 40 CFR Part 63 Subpart WWW shall be demonstrated by performing the work practice required for the Permittee's operation.

RTO/Manufacturing (EU: A42)/(A01, A04, A05, A07, A019, A11, A13, A15, A21, A22, A24 through A27, A31, A35, and A39) *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*

8. The permittee shall continuously monitor operating temperature of the RTO, to assure compliance with the oxidation efficiency. The data shall be recorded based on a 10 minute block average. *[40 CFR Part 64, 40 CFR Part 63.998, and AQR 12.5.2.6]*

9. 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 a 10 minute block average. *[40 CFR Part 64 and AQR 12.5.2.6]*
10. The permittee shall monitor the air inlet pressure of the preconcentrators to assure compliance with minimum negative pressure requirement for 100 percent capture efficiency of the permanent total enclosure and the monitoring system shall alarm if the minimum negative pressure is not maintained. *[40 CFR Part 64 and AQR 12.5.2.6]*
11. An excursion is defined as an event in which either the RTO operating temperature monitoring device records a temperature (10-minute average value) below 1,600 °F, or the preconcentrator desorption temperature monitoring device records a temperature (10-minute average value) below 275 °F, during operation. *[40 CFR Part 64 and AQR 12.5.2.6]*
12. Upon the occurrence of an excursion, the permittee shall investigate the causes for the excursion; implement corrective actions, record the event summary, and report it in the annual compliance certification document. The occurrence of more than 5 excursions in a 6-month period requires the permittee to prepare and implement a Quality Improvement Plan (QIP). *[40 CFR 64 and AQR 12.5.2.6]*
13. The permittee shall calibrate the RTO operating temperature and the preconcentrator desorption temperature monitoring devices, including the corresponding data chart recorders annually. The inlet pressure monitor to the preconcentrators shall also be calibrated annually. Additionally, the data chart recorders shall be checked on a daily basis for proper operation. *[40 CFR Part 64 and AQR 12.5.2.6]*
14. The continuous temperature monitoring system for the RTO is subject to the following general requirements pursuant to 40 CFR 63 Subpart SS: *[40 CFR Part 63.996]*
 - a. All monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's O & M manual or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.
 - b. The permittee shall maintain and operate each CPMS as specified in this permit, or in a relevant subpart, and in a manner consistent with good air pollution control practices.
 - c. The permittee shall ensure the immediate repair or replacement of CPMS parts to correct "routine" or otherwise predictable CPMS malfunctions. The necessary parts for routine repairs of the affected equipment shall be readily available. If the repair was performed following the written start-up, shutdown, and malfunction plan developed according to the provisions in 40 CFR 63.6(e)(3), and the CPMS is repaired immediately, this action shall be recorded as specified in 40 CFR Part 63.998(c)(1)(ii)(E).
 - d. The Administrator's determination of whether acceptable operation and maintenance procedures are being used for the CPMS will be based on information that may include, but is not limited to, review of operation and maintenance procedures, operation and maintenance records as specified in 40 CFR Part 63.998(c)(1)(i) and (ii), manufacturer's O & M manual, and inspection of the CPMS.

- e. All CPMS's shall be installed such that representative measurements of parameters from the regulated source are obtained.
 - f. In accordance with the referencing subpart, except for system breakdowns, repairs, maintenance periods, instrument adjustments, or checks to maintain precision and accuracy, calibration checks, and zero and span adjustments, all CPMS shall be in continuous operation when emissions are being routed to the monitored device.
15. The permittee shall monitor the monthly hours of operation of each air heater. *[AQR 12.5.2.6]*
 16. The permittee shall monitor the monthly gallons of propane consumed by all fuel burning equipment except the RTO. *[AQR 12.5.2.6]*
 17. The permittee shall monitor the monthly gallons of propane consumed by the RTO (EU: A42). *[AQR 12.5.2.6]*
 18. The permittee shall use the option described in 40 CFR Part 63.5810(c) to meet the applicable organic HAP emissions limits in Table 3 to 40 CFR Part 63 subpart WWW. In this option, the permittee shall demonstrate each month that the source meets each weighted average of the applicable organic HAP emissions limits in Table 3 to this subpart by performing the following: *[40 CFR Part 63.5835(a) and AQR 12.5.2.6]*
 - a. Each month, the permittee shall calculate the weighted average organic HAP emissions limit for all open molding operations for the source for the last 12-month period to determine the organic HAP emissions limit the source must meet. To do this, the applicable individual organic HAP emissions limits in Table 3 of subpart WWW and each type of resin used in *the last 12 months for each open molding operation type are used as* shown in the following equation.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

Where:

EL_i = organic HAP emissions limit for operation type i , lbs/ton from Table 3 to this subpart;

Material_i = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i , tons;

n = number of operations.

- b. The permittee shall establish actual organic HAP emissions factor for each different process stream within each operation type. The Permittee must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding discussed in 40 CFR Part 63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. The permittee must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in 40 CFR Part 63.5850. The organic HAP emissions factor calculated from the equations in Table 1 of subpart WWW is multiplied by the add-on control factor

to calculate the organic HAP emissions factor after control. Use the following equation to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\% \text{ Control Efficiency}}{100}$$

Where:

Percent Control Efficiency = a value calculated from organic HAP emissions test measurements made according to the requirements of 40 CFR Part 63.5850 to this subpart.

- c. The permittee shall then group the process streams described in paragraph (b) to this section by operation type and resin application method or gel coat type listed in Table 3 of subpart WWW and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months as shown in the following equation.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

Where:

Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i, lbs/ton;

Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;

n = number of process streams where you calculated an organic HAP emissions factor.

- d. Each month calculate the weighted average organic HAP emissions factor for open molding and centrifugal casting as shown in the following equation.

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation EF}_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

Where:

Actual Individual EF_i = Actual organic HAP emissions factor for operation type i, lbs/ton;

Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n = number of operations.

- e. Compare the values calculated in paragraphs (a) and (d) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the permittee is in compliance. [40 CFR Part 63.5810(c) and AQR 12.5.2.6]

- f. The permittee shall complete the monthly compliance demonstrations required by this section within 15 days after the end of each month.
- 19. During production, the permittee must collect and keep a record of data as indicated in 40 CFR Part 63, Subpart SS, since the permittee is using an add-on control device. *[40 CFR Part 63.5895(a) and AQR 12.5.2.6]*
- 20. The permittee must monitor and collect data as specified in paragraphs (b)(1) through (4) of 40 CFR Part 63.5895. *[40 CFR Part 63.5895 and AQR 12.5.2.6]*

Storage Silo *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*

- 21. The permittee shall perform monthly visual inspection of the binvent (EU: A23) 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 12.5.2.6]*

Engines/Water Pump *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*

- 22. The permittee shall operate the fire pump (EU: B01) with a nonresettable hour meter and monitor the duration of operation for testing, maintenance and nonemergency operation, and separately for emergencies. The nature of the emergency leading to emergency operation shall be documented. *[AQR 12.5.2.6]*

E. TESTING

- 1. Performance testing is subject to 40 CFR Part 60.8 (as amended) and the Clark County Department of Air Quality Guideline on Source Testing (9/19/2019). Performance testing shall be the instrument for determining initial and subsequent compliance with the control requirements and emission limitations set forth in this OP. *[AQR 12.5.2.8(a)]*
- 2. The permittee shall conduct performance tests, performance evaluations, design evaluations, capture efficiency testing and other initial compliance demonstrations required by 40 CFR Part 63, Subpart WWWW, in accordance with 40 CFR Part 63, Subpart SS and 40 CFR Part 63.5850. The basic requirements for performance tests, performance evaluations, and design evaluations are presented in Table 6 of 40 CFR Part 63 Subpart WWWW. *[40 CFR Part 63.5850(a)]*
- 3. Performance testing is subject to the following requirements according to 40 CFR Part 63 Subpart WWWW:
 - a. Each performance test must be conducted according to the requirements in 40 CFR Part 63.7(e)(1) and under the specific conditions that 40 CFR Part 63, Subpart SS specifies. *[40 CFR Part 63.5850(b) and AQR 12.5.2.8(a)]*
 - b. Each performance evaluation must be conducted according to the requirements in 40 CFR Part 63.8(e) as applicable and under the specific conditions that 40 CFR Part 63, Subpart SS specifies. *[40 CFR Part 63.5850(c) and AQR 12.5.2.8(a)]*
 - c. The permittee may not conduct performance tests or performance evaluations during periods of startup, shutdown, or malfunction, as specified in 40 CFR Part 63.7(e)(1). *[40 CFR Part 63.5850(d) and AQR 12.5.2.8(a)]*

- d. The permittee must conduct the control device performance test using the emission measurement methods specified in paragraphs (e)(1) through (5) of 40 CFR Part 63.5850. *[40 CFR Part 63.5850(e) and AQR 12.5.2.8(a)]*
 - e. The control device performance test must consist of three runs and each run must last at least 1 hour. The production conditions during the test runs must represent normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates. *[40 CFR Part 63.5850(f) and AQR 12.5.2.8(a)]*
 - f. For each production line, the permittee must simultaneously test the combined flow upstream of the preconcentrator, and the combined outlet flow from both the RTO and the preconcentrator to determine the control device destruction efficiency. If the outlet flow from the concentrator and oxidizer are exhausted in separate stacks, the permittee must test both stacks simultaneously with the inlet to the concentrator to determine the control device destruction efficiency. *[40 CFR Part 63.5850(g) and AQR 12.5.2.8(a)]*
- 4. The permittee shall conduct performance tests to demonstrate compliance with emission limits and the capture efficiency and destruction efficiency requirements of each production line's control device and permanent total enclosure every five years, provided the rates of permitted production and control devices remain unchanged. If a production line is not in operation at the time of its required performance test, testing shall take place no later than 180 days after the restart of production on that line. *[AQR 12.5.2.8(a)]*
 - 5. The permittee shall conduct subsequent performance tests no later than 90 days after the anniversary date of the last performance test. *[AQR 12.5.2.8(a)]*
 - 6. To demonstrate 100 percent capture efficiency for spray booths and other emission units at the source identified as part of a permanent total enclosure (identified as having preconcentrator and RTO as controls), the permittee shall conduct performance testing utilizing Method 204 in Appendix M of 40 CFR Part 51, concurrent with the testing that determines compliance with control device destruction efficiencies. *[AQR 12.5.2.8(a)]*
 - 7. The permittee shall determine the overall removal efficiency of the preconcentrator-RTO system for VOC emissions from Lines 1 and 2 and other emission units identified in Table III-A-1 as part of the permanent total enclosure (identified as having preconcentrator and RTO as controls) by simultaneously testing the inlet and outlet of the preconcentrator-RTO system in accordance with 40 CFR Part 63, Subpart SS, and 40 CFR Part 63.5850. The performance test shall also demonstrate compliance with the emission limitations and overall control efficiencies specified in this permit. *[AQR 12.5.2.8(a)]*
 - 8. During the RTO performance test, the permittee must also monitor and record separately the amounts of production resin, tooling resin, pigmented gel coat, clear gel coat, and tooling gel coat applied inside the enclosure that is vented to the control device. *[40 CFR Part 63.5850(h) and AQR 12.5.2.8(a)]*
 - 9. 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 12.5.2.8(a)]*

10. Pursuant to AQR Section 10 (as revised), the permittee that fails to demonstrate compliance with the emissions standard 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 12.5.2.8(a)]*

F. RECORDKEEPING

1. All records logs, etc. shall be made available to the Control Officer during regular business hours. *[40 CFR Part 63.5915, AQR 12.5.2.6(d) & AQR 12.5.2.8]*
2. Records and data required by this permit to be maintained by the permittee may be audited at any time by a third party selected by the Control Officer. *[AQR 4.1]*
3. The permittee shall create and maintain records, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
4. The permittee shall maintain the records required by 40 CFR Part 63 Subpart WWWW: *[40 CFR Part 63.5915 and AQR 12.5.2.6]*
 - a. a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63 Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in 40 CFR Part 63.10(b)(2)(xiv);
 - b. the records in 40 CFR part 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction;
 - c. records of performance tests, design, and performance evaluations as required in 40 CFR Part 63.10(b)(2);
 - d. all records required in 40 CFR Part 63 Subpart SS, otherwise not specified in this section, to show continuous compliance with 40 CFR Part 63 subpart WWWW;
 - e. records of all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents or weighted average organic HAP emissions limit and weighted average organic HAP emissions factors for operations listed in Table 3 of 40 CFR Part 63 subpart WWWW; and
 - f. a certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63 subpart WWWW, as applicable.
5. The permittee shall maintain records on-site that require semiannual reporting and include, at a minimum: *[AQR 12.5.2.6]*
 - 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 Part 63.10;
 - b. monthly, consecutive 12-month total amount of all gelcoats, barriercoat, laminates, CaSO₄ (Storage Silo) and other raw materials;
 - c. monthly, consecutive 12-month total amount of all materials used for mold preparation (cleaner, sealer and polymer release agent);

- d. monthly, consecutive 12-month total amount of all materials used for protective coatings;
 - e. monthly, consecutive 12-month total hours of operation of each air heater;
 - f. monthly, consecutive 12-month total consumption of propane gas for the RTO;
 - g. monthly, consecutive 12-month total consumption of propane gas for the source;
 - h. date and duration of operation of the fire pump for testing, maintenance, and nonemergency use (EU: B01); and
 - i. date and duration of operation of the fire pump for emergency use, including documentation justifying use during the emergency (EU: B01);
 - j. deviations from permit requirements that result in excess emissions (reported as required in Section II-D-9 of this OP); and
 - k. deviations from permit requirements that do not result in excess emissions.
6. The permittee shall maintain records on-site that include, at a minimum: *[AQR 12.5.2.6]*
- a. daily hours of operation of spray booths, preconcentrators and the RTO;
 - b. styrene content of all gelcoats, barriercoats, laminates, mold preparation, protective coatings and other raw materials used on a daily basis;
 - c. VOC/HAP content of all gelcoats, barriercoats, laminates, mold preparation, protective coatings and other raw materials used on a daily basis;
 - d. records of preconcentrators and RTO maintenance;
 - e. records of binvent inspections and maintenance;
 - f. continuous records (10-minute block average values) of RTO operating temperatures according to Condition III-D-5 *[40 CFR Part 63.998(b)(1) and 40 CFR Part 63.998(c)(2)]*;
 - g. continuous records of preconcentrator desorption temperature according to Condition III-C-2;
 - h. daily average values of continuously monitored RTO operating temperature, calculated from data meeting the specifications of 40 CFR Part 63.998 (b)(2) for each operating day *[40 CFR Part 63.998(b)(3) and 40 CFR Part 63.998(c)(2)]*;
 - i. up-to-date, readily accessible records of periods of operation during which the continuously-monitored parameter boundaries are exceeded for the RTO. The parameter boundaries are established pursuant to 40 CFR Part 63.996(c)(6). *[40 CFR Part 63.998(c)(2)]*
 - j. records of inlet air pressure alarms of the preconcentrators;
 - k. records of occurrence of excursions as defined in III-D-8 of this document;
 - l. calibration records of temperature monitoring and recording device(s), and preconcentrator inlet air pressure monitoring device;
 - m. results of daily and monthly visible emission observations;
 - n. filter media weekly inspection results and maintenance activities;
 - o. equipment inspections and maintenance for the fire pump (EU: B01);

- p. manufacturer's O & M manuals for the fire pump (EU: B01), all control devices; all monitoring equipment;
 - q. calculation of annual emissions for each emission unit and for the entire source; and
 - r. performance tests results.
- 7. The permittee shall demonstrate compliance with the opacity limitation by maintaining a log showing at least, the dates and time when observations are taken and the steps taken to make any needed corrections to bring opacity into compliance. *[AQR 12.5.2.6]*
 - 8. 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 12.5.2.6]*
 - 9. For all inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). *[AQR 12.5.2.6]*
 - 10. 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 was taken or data was entered and shall be made available to DAQ upon request. *[AQR 12.5.2.6]*
 - 11. The Control Officer reserves the right to require additional requirements concerning records and recordkeeping for this source. *[AQR 12.5.2.6]*

G. REPORTING

- 1. The permittee shall comply with all notification, recordkeeping and reporting requirements of 40 CFR Part 63.10, and 40 CFR Part 63 Subpart WWWW. *[AQR 12.5.2.6(d)(4)(B)]*
- 2. All report submissions shall be addressed to the attention of the Control Officer. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
- 3. All reports shall contain the following: *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
 - a. A certification statement on the first page, e.g., "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate and complete." (A sample form is available from DAQ.)
 - b. A certification signature from a responsible official of the company and the date of certification.
- 4. The permittee shall submit semiannual monitoring reports to DAQ. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
- 5. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
 - a. The report shall include a semiannual summary of each item listed in Section III-F-5 of this OP.
 - b. The report shall be based on a calendar semiannual period, which includes partial reporting periods.
 - c. The report shall be received by DAQ within 30 calendar days after the semiannual period.

6. Regardless of the date of issuance of this OP, the source shall comply with the schedule for report submissions outlined in Table III-G-1. [AQR 12.5.2.6(d) & AQR 12.5.2.8]

Table III-G-1: Required Submission Dates for Various Reports

Required Report	Applicable Period	Due Date
Semiannual report for 1 st six-month period	January, February, March, April, May, June	July 30 each year ¹
Semiannual report for 2 nd six-month period; any additional annual records required	July, August, September, October, November, December	January 30 each year ¹
Semiannual 40 CFR 63.5910 Compliance Report for 1 st half of the year	January, February, March, April, May, June	July 31 each year
Semiannual 40 CFR 63.5910 Compliance Report for 2 nd half of the year	July, August, September, October, November, December	January 31 each year
Annual Compliance Certification	Calendar year	January 30 each year ¹
Annual Emissions Inventory Report	Calendar year	March 31 each year ¹
Annual Emissions Statement ²	Calendar year	March 31 each year ¹
Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 24 hours of the permittee learns of the event
Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 72 hours of the notification
Deviation Report without Excess Emissions	As required	Along with semiannual reports ¹
Excess Emissions that Pose a Potential Imminent and Substantial Danger	As required	Within 12 hours of the permittee learns of the event
Performance Testing Protocol	As required	No less than 45 days, but no more than 90 days, before the anticipated test date ¹
Performance Testing	As required	Within 60 days of end of test ¹

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

² Required only for stationary sources that emit 25 tons or more of nitrogen oxide (NO_x) and/or emit 25 tons or more of volatile organic compounds (VOC) during a calendar year.

7. The permittee must submit all of the notifications in Table 13 of 40 CFR Part 63 Subpart WWW (provided as Attachment 3 to this document) that applies to the source to the Administrator and the Control Officer at the addresses presented in this Section. The notifications are described more fully in 40 CFR Part 63 Subpart A, referenced in Table 13 of the subpart. If there is a change to the information submitted in any notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change. *[40 CFR Part 63.5905]*
8. The permittee must submit each applicable report described in Table 14 of 40 CFR part 63 Subpart WWW (provided as Attachment 4 to this document) to the Administrator and the Control Officer at the addresses presented in this Section. Applicable reports shall be submitted by the date specified in Table 14 unless the Administrator has approved a different schedule for submission of reports under 40 CFR Part 63.10(a), and according to paragraphs (b)(1) through (5) of 40 CFR Part 63.5910. The reports shall contain the information required under 40 CFR Part 63.5910(c) through (i), as applicable. *[AQR 12.5.2.6 and 40 CFR Part 63.5910]*
9. The permittee must report each deviation from each applicable standard in 40 CFR Part 63.5805. The deviations must be reported according to the requirements in 40 CFR Part 63.5910. *[40 CFR Part 63.5900(b) and AQR 12.5.2.6]*
10. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit emission limits, applicable permit requirements, and requirements of applicable federal regulations. *[AQR 4.1]*

H. MITIGATION

The source has no federal offset requirements. *[AQR 59.1.1]*

IV. OTHER REQUIREMENTS

1. The source is subject to those parts of the General Provisions in 40 CFR Part 63.1 through 63.15 which are presented in Table 15 of 40 CFR Part 63 Subpart WWW as applicable. Table 15 of 40 CFR Part 63 Subpart WWW is listed as Attachment 2 to this document. *[40 CFR Part 63.5925]*
2. 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 Part 63.6. *[AQR 12.5.2.6]*
3. The permittee shall maintain a written start-up, shut-down and malfunction plan according to the provisions in 40 CFR part 63.6(e)(3). A copy of the plan shall be kept on site. *[AQR 12.5.2.6]*
4. The permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a chlorofluorocarbon or hydrochlorofluorocarbon compound as a working fluid, unless such fluid has been approved for sale in such use by the EPA Administrator. The permittee shall keep records of all paperwork relevant to the applicable requirements of 40 CFR Part 82 on-site. *[40 CFR Part 82]*

V. PERMIT SHIELD

The source has not requested a permit shield. [AQR 12.5.2.9]

ATTACHMENT 1—APPLICABLE REGULATIONS

Requirements Specifically Identified as Applicable

1. NRS, Chapter 445B.
2. Applicable AQRs listed in Table A-1.

Table A-1: Applicable Clark County AQRs

Citation	Title
AQR 0	"Definitions"
AQR 4	"Control Officer"
AQR 5	"Interference with Control Officer"
AQR 8	"Persons Liable for Penalties – Punishment: Defense"
AQR 9	"Civil Penalties"
AQR 10	"Compliance Schedules"
AQR 11	"Ambient Air Quality Standards"
AQR 12.0	"Applicability and General Requirements"
AQR 12.4	"Authority to Construct Application and Permit Requirements for Part 70 Sources"
AQR 12.5	"Part 70 Operating Permit Requirements"
AQR 12.9	"Annual Emissions Inventory Requirement"
AQR 12.13	"Posting of Permit"
AQR 13.2(b)(1)	"Subpart A - General Provisions"
AQR 13.2(b)(82)	"Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
AQR 13.2(b)(79)	"Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants for Source Categories (NESHAP) - Reinforced Plastic Composites Production"
AQR 13.2(b)(34)	"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"
AQR 18	"Permit and Technical Service Fees"
AQR 25	"Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown"
AQR 26	"Emission of Visible Air Contaminants"
AQR 28	"Fuel Burning Equipment"
AQR 40	"Prohibitions of Nuisance Conditions"
AQR 41	"Fugitive Dust" (AQR 41.1.2 only)
AQR 42	"Open Burning"
AQR 43	"Odors in the Ambient Air"
AQR 70	"Emergency Procedures"
AQR 80	"Circumvention"

3. Clean Air Act Amendments (42 U.S.C. § 7401, et seq.)

4. Applicable 40 CFR sections.

Citation	Title
40 CFR Part 51	Appendix M Method 204 or equivalent
40 CFR Part 52.21	"Prevention of significant deterioration of air quality"
40 CFR Part 52.1470	"Approval and Promulgation of Implementation Plans, Subpart DD—Nevada"
40 CFR Part 60, Subpart A	"General Provisions"
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR Part 60, Appendix A-3	"Test Methods 4 through 5I" (PM in g/dscm)
40 CFR Part 60, Appendix A-4	"Test Methods 6 through 10B" (opacity)
40 CFR Part 63, Subpart A	"General Provisions"
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
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 64	Compliance Assurance Monitoring
40 CFR Part 70	"State Operating Permit Programs"
40 CFR Part 82	"Protection of Stratospheric Ozone"

ATTACHMENT 2

Table 15 of Subpart WWWW of Part 63—Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63

As specified in §63.5925, the parts of the General Provisions which apply to the permittee are shown in the following table:

The general provisions reference . . .	That addresses . . .	And applies to subpart WWWW of Part 63 . . .	Subject to the following additional information . . .
§63.1(a)(1)	General applicability of the general provisions	Yes	Additional terms defined in subpart WWWW of Part 63, when overlap between subparts A and WWWW of Part 63 of this part, subpart WWWW of Part 63 takes precedence.
§63.1(a)(2) through (4)	General applicability of the general provisions	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of Part 63 . . .	Subject to the following additional information . . .
§63.1(a)(5)	Reserved	No	
§63.1(a)(6)	General applicability of the general provisions	Yes	
§63.1(a)(7) through (9)	Reserved	No	
§63.1(a)(10) through (14)	General applicability of the general provisions	Yes	
§63.1(b)(1)	Initial applicability determination	Yes	Subpart WWW of Part 63 clarifies the applicability in §§63.5780 and 63.5785.
§63.1(b)(2)	Reserved	No.	
§63.1(b)(3)	Record of the applicability determination	Yes	
§63.1(c)(1)	Applicability of this part after a relevant standard has been set under this part	Yes	Subpart WWW of Part 63 clarifies the applicability of each paragraph of Subpart A to sources subject to subpart WWW of Part 63.
§63.1(c)(2)	Title V operating permit requirement	Yes	All major affected sources are required to obtain a title V operating permit. Area sources are not subject to subpart WWW of Part 63.
§63.1(c)(3) and (4)	Reserved	No	
§63.1(c)(5)	Notification requirements for an area source that increases HAP emissions to major source levels	Yes	
§63.1(d)	Reserved	No	
§63.1(e)	Applicability of permit program before a relevant standard has been set under this part	Yes	
§63.2	Definitions	Yes	Subpart WWW of Part 63 defines terms in §63.5935. When overlap between subparts A and WWW of Part 63 occurs, you must comply with the subpart WWW of Part 63 definitions, which take precedence over the subpart A definitions.
§63.3	Units and abbreviations	Yes	Other units and abbreviations used in subpart WWW of Part 63 are defined in subpart WWW of Part 63.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of Part 63 . . .	Subject to the following additional information . . .
§63.4	Prohibited activities and circumvention	Yes	§63.4(a)(3) through (5) is reserved and does not apply.
§63.5(a)(1) and (2)	Applicability of construction and reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWW of Part 63.
§63.5(b)(1)	Relevant standards for new sources upon construction	Yes	Existing facilities do not become reconstructed under subpart WWW of Part 63.
§63.5(b)(2)	Reserved	No	
§63.5(b)(3)	New construction/reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWW of Part 63.
§63.5(b)(4)	Construction/reconstruction notification	Yes	Existing facilities do not become reconstructed under subpart WWW of Part 63.
§63.5(b)(5)	Reserved	No	
§63.5(b)(6)	Equipment addition or process change	Yes	Existing facilities do not become reconstructed under subpart WWW of Part 63.
§63.5(c)	Reserved	No	
§63.5(d)(1)	General application for approval of construction or reconstruction	Yes	Existing facilities do not become reconstructed under subpart WWW of Part 63.
§63.5(d)(2)	Application for approval of construction	Yes	
§63.5(d)(3)	Application for approval of reconstruction	No	
§63.5(d)(4)	Additional information	Yes	
§63.5(e)(1) through (5)	Approval of construction or reconstruction	Yes	
§63.5(f)(1) and (2)	Approval of construction or reconstruction based on prior State preconstruction review	Yes	
§63.6(a)(1)	Applicability of compliance with standards and maintenance requirements	Yes	
§63.6(a)(2)	Applicability of area sources that increase HAP emissions to become major sources	Yes	
§63.6(b)(1) through (5)	Compliance dates for new and reconstructed sources	Yes	Subpart WWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(b)(6)	Reserved	No	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of Part 63 . . .	Subject to the following additional information . . .
§63.6(b)(7)	Compliance dates for new operations or equipment that cause an area source to become a major source	Yes	New operations at an existing facility are not subject to new source standards.
§63.6(c)(1) and (2)	Compliance dates for existing sources	Yes	Subpart WWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(c)(3) and (4)	Reserved	No	
§63.6(c)(5)	Compliance dates for existing area sources that become major	Yes	Subpart WWW of Part 63 clarifies compliance dates in §63.5800.
§63.6(d)	Reserved	No	
§63.6(e)(1) and (2)	Operation & maintenance requirements	Yes	
§63.6(e)(3)	Startup, shutdown, and malfunction plan and recordkeeping	Yes	Subpart WWW of Part 63 requires a startup, shutdown, and malfunction plan only for sources using add-on controls.
§63.6(f)(1)	Compliance except during periods of startup, shutdown, and malfunction	No	Subpart WWW of Part 63 requires compliance during periods of startup, shutdown, and malfunction, except startup, shutdown, and malfunctions for sources using add-on controls.
§63.6(f)(2) and (3)	Methods for determining compliance	Yes	
§63.6(g)(1) through (3)	Alternative standard	Yes	
§63.6(h)	Opacity and visible emission Standards	No	Subpart WWW of Part 63 does not contain opacity or visible emission standards.
§63.6(i)(1) through (14)	Compliance extensions	Yes	
§63.6(i)(15)	Reserved	No	
§63.6(i)(16)	Compliance extensions	Yes	
§63.6(j)	Presidential compliance exemption	Yes	
§63.7(a)(1)	Applicability of performance testing requirements	Yes	
§63.7(a)(2)	Performance test dates	No	Subpart WWW of Part 63 initial compliance requirements are in §63.5840.
§63.7(a)(3)	CAA Section 114 authority	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of Part 63 . . .	Subject to the following additional information . . .
§63.7(b)(1)	Notification of performance test	Yes	
§63.7(b)(2)	Notification rescheduled performance test	Yes	
§63.7(c)	Quality assurance program, including test plan	Yes	Except that the test plan must be submitted with the notification of the performance test.
§63.7(d)	Performance testing facilities	Yes	
§63.7(e)	Conditions for conducting performance tests	Yes	Performance test requirements are contained in §63.5850. Additional requirements for conducting performance tests for continuous lamination/casting are included in §63.5870.
§63.7(f)	Use of alternative test method	Yes	
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes	
§63.7(h)	Waiver of performance tests	Yes	
§63.8(a)(1) and (2)	Applicability of monitoring requirements	Yes	
§63.8(a)(3)	Reserved	No	
§63.8(a)(4)	Monitoring requirements when using flares	Yes	
§63.8(b)(1)	Conduct of monitoring exceptions	Yes	
§63.8(b)(2) and (3)	Multiple effluents and multiple monitoring systems	Yes	
§63.8(c)(1)	Compliance with CMS operation and maintenance requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(2) and (3)	Monitoring system installation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(4)	CMS requirements	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(c)(5)	Continuous Opacity Monitoring System (COMS) minimum procedures	No	Subpart WWW of Part 63 does not contain opacity standards.
§63.8(c)(6) through (8)	CMS calibration and periods CMS is out of control	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of Part 63 . . .	Subject to the following additional information . . .
§63.8(d)	CMS quality control program, including test plan and all previous versions	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(1)	Performance evaluation of CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(2)	Notification of performance evaluation	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(3) and (4)	CMS requirements/alternatives	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(5)(i)	Reporting performance evaluation results	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(e)(5)(ii)	Results of COMS performance evaluation	No	Subpart WWW of Part 63 does not contain opacity standards.
§63.8(f)(1) through (3)	Use of an alternative monitoring method	Yes	
§63.8(f)(4)	Request to use an alternative monitoring method	Yes	
§63.8(f)(5)	Approval of request to use an alternative monitoring method	Yes	
§63.8(f)(6)	Request for alternative to relative accuracy test and associated records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.8(g)(1) through (5)	Data reduction	Yes	
§63.9(a)(1) through (4)	Notification requirements and general information	Yes	
§63.9(b)(1)	Initial notification applicability	Yes	
§63.9(b)(2)	Notification for affected source with initial startup before effective date of standard	Yes	
§63.9(b)(3)	Reserved	No	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of Part 63 . . .	Subject to the following additional information . . .
§63.9(b)(4)(i)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	Yes	
§63.9(b)(4)(ii) through (iv)	Reserved	No	
§63.9(b)(4)(v)	Notification for a new or reconstructed major affected source with initial startup after effective date for which an application for approval of construction or reconstruction is required	Yes	Existing facilities do not become reconstructed under subpart WWW of Part 63.
§63.9(b)(5)	Notification that you are subject to this subpart for new or reconstructed affected source with initial startup after effective date and for which an application for approval of construction or reconstruction is not required	Yes	Existing facilities do not become reconstructed under subpart WWW of Part 63.
§63.9(c)	Request for compliance extension	Yes	
§63.9(d)	Notification of special compliance requirements for new source	Yes	
§63.9(e)	Notification of performance test	Yes	
§63.9(f)	Notification of opacity and visible emissions observations	No	Subpart WWW of Part 63 does not contain opacity or visible emission standards.
§63.9(g)(1)	Additional notification requirements for sources using CMS	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.9(g)(2)	Notification of compliance with opacity emission standard	No	Subpart WWW of Part 63 does not contain opacity emission standards.
§63.9(g)(3)	Notification that criterion to continue use of alternative to relative accuracy testing has been exceeded	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.9(h)(1) through (3)	Notification of compliance status	Yes	
§63.9(h)(4)	Reserved	No	
§63.9(h)(5) and (6)	Notification of compliance status	Yes	
§63.9(i)	Adjustment of submittal deadlines	Yes	
§63.9(j)	Change in information provided	Yes	

The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of Part 63 . . .	Subject to the following additional information . . .
§63.10(a)	Applicability of recordkeeping and reporting	Yes	
§63.10(b)(1)	Records retention	Yes	
§63.10(b)(2)(i) through (v)	Records related to startup, shutdown, and malfunction	Yes	Only applies to facilities that use an add-on control device.
§63.10(b)(2)(vi) through (xi)	CMS records, data on performance tests, CMS performance evaluations, measurements necessary to determine conditions of performance tests, and performance evaluations	Yes	
§63.10(b)(2)(xii)	Record of waiver of recordkeeping and reporting	Yes	
§63.10(b)(2)(xiii)	Record for alternative to the relative accuracy test	Yes	
§63.10(b)(2)(xiv)	Records supporting initial notification and notification of compliance status	Yes	
§63.10(b)(3)	Records for applicability determinations	Yes	
§63.10(c)(1)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(2) through (4)	Reserved	No	
§63.10(c)(5) through (8)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(c)(9)	Reserved	No	
§63.10(c)(10) through (15)	CMS records	Yes	This section applies if you elect to use a CMS to demonstrate continuous compliance with an emission limit.
§63.10(d)(1)	General reporting requirements	Yes	
§63.10(d)(2)	Report of performance test results	Yes	
§63.10(d)(3)	Reporting results of opacity or visible emission observations	No	Subpart WWW of Part 63 does not contain opacity or visible emission standards.
§63.10(d)(4)	Progress reports as part of extension of compliance	Yes	
§63.10(d)(5)	Startup, shutdown, and malfunction reports	Yes	Only applies if you use an add-on control device.

The general provisions reference . . .	That addresses . . .	And applies to subpart WWW of Part 63 . . .	Subject to the following additional information . . .
§63.10(e)(1) through (3)	Additional reporting requirements for CMS	Yes	This section applies if you have an add-on control device and elect to use a CEM to demonstrate continuous compliance with an emission limit.
§63.10(e)(4)	Reporting COMS data	No	Subpart WWW of Part 63 does not contain opacity standards.
§63.10(f)	Waiver for recordkeeping or reporting	Yes	
§63.11	Control device requirements	Yes	Only applies if you elect to use a flare as a control device.
§63.12	State authority and delegations	Yes	
§63.13	Addresses of State air pollution control agencies and EPA Regional Offices	Yes	
§63.14	Incorporations by reference	Yes	
§63.15	Availability of information and confidentiality	Yes	

ATTACHMENT 3

Table 13 of Subpart WWW of Part 63—Applicability and Timing of Notifications

As required in §63.5905(a), The permittee must determine the applicable notifications and submit them by the dates shown in the following table:

If your facility . . .	You must submit . . .	By this date . . .
1. Is an existing source subject to this subpart	An Initial Notification containing the information specified in §63.9(b)(2)	No later than the dates specified in §63.9(b)(2).
2. Is a new source subject to this subpart	The notifications specified in §63.9(b)(4) and (5)	No later than the dates specified §63.9(b)(4) and (5).
3. Qualifies for a compliance extension as specified in §63.9(c)	A request for a compliance extension as specified in §63.9(c)	No later than the dates specified in §63.6(i).
4. Is complying with organic HAP emissions limit averaging provisions	A Notification of Compliance Status as specified in §63.9(h)	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging	A Notification of Compliance Status as specified in §63.9(h)	No later than 30 calendar days after your facility's compliance date.

If your facility . . .	You must submit . . .	By this date . . .
6. Is complying by using an add-on control device	a. A notification of intent to conduct a performance test as specified in §63.9(e)	No later than the date specified in §63.9(e).
	b. A notification of the date for the CMS performance evaluation as specified in §63.9(g)	The date of submission of notification of intent to conduct a performance test.
	c. A Notification of Compliance Status as specified in §63.9(h)	No later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

ATTACHMENT 4

Table 14 of Subpart WWW of Part 63—Requirements for Reports

As required in §63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:

You must submit a(n)	The report must contain . . .	You must submit the report . . .
1. Compliance report	a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in §63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period	Semiannually according to the requirements in §63.5910(b).
	b. The information in §63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in §63.8(c)(7), the report must contain the information in §63.5910(e)	Semiannually according to the requirements in §63.5910(b).
	c. The information in §63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan	Semiannually according to the requirements in §63.5910(b).

You must submit a(n)	The report must contain . . .	You must submit the report . . .
2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan	a. Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	b. The information in §63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§63.10(d)(5)(ii)).

From: Dale Reed
To: [Silvia Gonzalez](#)
Subject: Re: DAQ Permit_and_TSD for Source ID: 00075_Aquatic Co
Date: Wednesday, November 17, 2021 4:26:48 PM

Received

Sent from my iPhone

On Nov 17, 2021, at 4:14 PM, Silvia Gonzalez <[SXG@clarkcountynv.gov](mailto: SXG@clarkcountynv.gov)> wrote:

CAUTION: This email originated from outside of American Bath Group. Do not click links, open attachments, or forward unless you recognize the sender and know the content is safe. Please report any suspicious attachments, links, or requests for sensitive information.

Attached are the Permit and Technical Support documents for Source ID: 00075, Aquatic, Co. The documents should be printed and maintained on site.

If you have any questions regarding the Permit, please Dawn Leaper at 702-455-5942.

Please confirm receipt of the documents.

Thank you,

Silvia Gonzalez
Administrative Secretary
Department of Air Quality
Permitting Division
702-455-8007
[sxg@clarkcountynv.gov](mailto: sxg@clarkcountynv.gov)

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