

## AIR QUALITY SYNTHETIC MINOR SOURCE PERMIT TO OPERATE

**Permit No.:** AAIR19-0047

**Permit Expiration:** September 1, 2026

**Permit Issued To:** Atlas Roofing Corporation

**Physical Address:** 13695 Mt. Anderson Street, Reno, NV 89506

**Mailing Address:** 13695 Mt. Anderson Street, Reno, NV 89506

**Billing Address:** 13695 Mt. Anderson Street, Reno, NV 89506

**Responsible Official:** Edouard Selle, Plant Manager

**Phone:** (775) 343-3400

### Facility Description:

Atlas Roofing Corporation is an expanded foam product manufacturer located in Hydrographic Area 92A. This source category falls under Standard Industry Classification (SIC) code 3086, "Plastics Foam Products" and North American Industrial Classification System (NAICS) code 326140, "Polystyrene Foam Product Manufacturing".

### Allowable Emissions:

The following quantities of emissions are the facility's allowable emissions based upon the source's potential to emit, as determined by the physical and operational design of the equipment and any practically enforceable permit conditions that limit the emissions of the source based on use of emissions control equipment, controlled operating rates, hours of operation, or other emissions control methods. The following quantities are used to determine annual permit maintenance fees and are enforceable emissions limits:

1. The discharge of PM10 to the atmosphere shall not exceed 18.78 tons per year.
2. The discharge of PM2.5 to the atmosphere shall not exceed 18.78 tons per year.
3. The discharge of sulfur dioxide to the atmosphere shall not exceed 0.05 tons per year.
4. The discharge of nitrous oxides to the atmosphere shall not exceed 8.76 tons per year.
5. The discharge of carbon monoxide to the atmosphere shall not exceed 7.36 tons per year.
6. The discharge of volatile organic compounds to the atmosphere shall not exceed 77.59 tons per year.

### Facility Emissions Unit List:

System A – Block Pre-Expander and Fluid Bed

- A.001: Kurtz VSD-3000 Pre-Expander

System B – Shape Pre-Expander

- B.001: Hirsch Preex 6000 Pre-Expander

System C – Bead Conditioning Bag Storage Enclosure

- C.001-C.018: Bead Conditioning Bags

System D – Block Mold

- D.001: Kurtz Block Mold

System E – Shape Molds

- E.001-E.006: Shape Molds

System F – Hot Wire Cutters

- F.001-F.006: Hot Wire Cutters

System G – Densifiers

- G.001-G.002: Densifiers

System H – Boiler (VOC Control)

- H.001: Hurst Series 500 Scotch Marine 10.5 mmBTU/hr boiler

System I – Boiler (Natural Gas)

- I.001: Hurst Series 500 Scotch Marine 10.5 mmBTU/hr boiler

**Issued by the Northern Nevada Public Health - Air Quality Management Division (AQMD) pursuant to its authority under District Board of Health Regulations Governing Air Quality Management Chapter 030, Source Permitting and Operation.**

## TABLE OF CONTENTS

I. General Provisions.....	4
II. Facility-Wide Provisions .....	8
III. Specific Provisions.....	10
A. System A – Block Pre-Expander .....	10
B. System B – Shape Pre-Expander .....	11
C. System C – Bead Conditioning Bag Storage Enclosure.....	12
D. System D – Block Mold.....	13
E. System E – Shape Molds .....	14
F. System F – Hot Wire Cutters.....	15
G. System G – Densifiers .....	16
H. System H – Boiler (VOC Control).....	17
I. System I – Boiler (Natural Gas).....	19
IV. Permit Authorization.....	21

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## I. General Provisions

- A. Transfer of Ownership** – A permit may not be transferred from one owner or piece of equipment to another unless otherwise specified in DBOH 030.000.C.2.c.(5). An owner or operator may apply for an administrative amendment reflecting a change of ownership or the name of the stationary source. The request for an administrative amendment shall be made on an application provided by the AQMD, and the application must be accompanied by a fee as determined by the District Board of Health. (DBOH 030.000.C.2)
- B. Posting of Permit** – The owner or operator shall post this permit conspicuously at or near the stationary source. (DBOH 030.020.A.2.c.(15))
- C. Modifications of Permit** – It is unlawful for any person to make any modifications affecting the emissions of any equipment covered by this permit without AQMD approval. Modification of the equipment covered by this permit outside of routine operation and maintenance may require a Permit to Construct. (DBOH 030.200.C.1.a)
- D. Record Keeping** – The owner or operator shall keep adequate records concerning pollutant emissions for any equipment or process for which the permit was issued. All owners and operators operating add-on emissions control equipment shall maintain records sufficient to legally demonstrate that the equipment has operated in compliance with all applicable Federal, State and Health District regulations. The owner or operator shall also record any times or occasions when the emissions control equipment is not in operation due to equipment failure, maintenance or any other reason. The owner or operator shall retain records of all required monitoring data and supporting information for five (5) years after the date of the sample collection, measurement, report or analysis, where supporting information includes all records regarding calibration and maintenance of the monitoring equipment and all original strip-chart recordings for continuous monitoring instrumentation. (DBOH 030.040.B.11, DBOH 030.020.A.2.c.(2))
- E. Right of Entry** – Upon presentation of credentials and other documents as may be required by law, the owner or operator shall allow the Control Officer or an authorized representative to enter the premises where a source is located, or emissions related activity is conducted and to: (DBOH 030.200.D.1q)
1. Have access to and copy any records that must be kept under the conditions of the permit.
  2. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under the permit.
  3. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
  4. Document alleged violations using devices such as cameras or video equipment.
- F. Opacity** – Except as otherwise provided in DBOH Regulations 030.000.B.5, no owner or operator may cause or permit the discharge into the atmosphere from any emission unit which is of an opacity equal to or greater than 20 percent. Opacity shall be determined by one of the following methods: (DBOH 030.000.B.5)
1. If opacity is determined by a visual measurement, it must be determined as set forth in Reference Method 9 in 40 CFR PART 60 Appendix A.

2. If a source uses a continuous monitoring system for the measurement of opacity, the data must be reduced to 6-minute averages as set forth in 40 CFR PART 60.13(h).

**G. Other Regulations** – This permit will not waive, or make less stringent, any limitations or requirements contained in or issued pursuant to the Washoe County portion of the Nevada State Implementation Plan (SIP), or that are otherwise federally enforceable. This permit shall not affect the responsibilities of the owner or operator to comply with the applicable portions of a control strategy in the SIP. (DBOH 030.200.D.1.u, 030.200.D.1.v)

**H. Concealment of Emissions** – No person may install, construct or use any device which conceals any emission without reducing the total release of regulated air pollutants to the atmosphere. (DBOH 030.000.B.2)

**I. Severability** – If any provisions of DBOH Regulations, this permit, or the application thereof to any person or circumstance is held invalid or unconstitutional, such invalidity or unconstitutionality shall not affect the other provisions or applications of these regulations which can be given effect without the invalid provision or application, and to this end the provisions of these regulations are declared to be severable. (DBOH 030.000.B.1)

**J. Property Rights** – The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. (DBOH 030.020.A.2.c(10))

**K. Excess Emissions and Deviations** – Excess emissions of regulated air pollutants and any deviations from the requirements of this permit shall be reported to the AQMD as specified in DBOH Regulations 030.040.A. (DBOH 030.040.A)

**L. Fees** – The owner or operator shall pay fees to the AQMD consistent with the approved fee schedule. (DBOH 030.200.D.1.k)

**M. Construction as Authorized** – If a new or modified source cannot be constructed as authorized by the permit, the owner or operator shall provide a written notice to the Control Officer of any proposed revisions and obtain a revised permit prior to commencing construction. A source may be subject to enforcement action as a result of differences between the permitted and constructed source. (DBOH 030.200.D.1.n)

**N. Revocation for Cause** – The permit may be revised, revoked, reopened and reissued, or terminated for cause by the Control Officer. (DBOH 030.000.C.1)

**O. Permit Noncompliance** – The owner or operator must comply with all conditions of the permit and any permit noncompliance constitutes a violation of the regulations and is grounds for enforcement action; for permit termination, or revocation; or for denial of a permit renewal application. The need to halt or reduce activity to maintain compliance with the conditions of the permit is not a defense to noncompliance with any condition of the permit. (DBOH 030.200.D.1.p, DBOH 030.020.A.2.c.(8))

- P. Records Request** – The owner or operator must 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 owner or operator 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 owner or operator may furnish such records directly to the Control Officer along with a claim of confidentiality pursuant to DBOH Regulations 020.000.D and NRS 445B.570. (DBOH 030.200 D.1.s)
- Q. Acknowledgement of Responsibility for Compliance** – The owner or operator’s commencement of operation constitutes an acknowledgement that the owner or operator assumes the responsibility of ensuring that the source’s emissions units and emission control equipment have been constructed and will be operated in compliance with all applicable requirements. (DBOH 030.200.D.2)
- R. Permit Revisions** – Any requested revision of an emission limitation, monitoring, testing, reporting, or recordkeeping requirement shall be made consistent with the permit revision requirements in DBOH Regulations 030.200.F. (DBOH 030.200.D.1.e)
- S. Responsible Official Certification** – A responsible official of the stationary source shall certify that, based on information and belief formed after a reasonable inquiry, the statements made in any document required to be submitted by any condition of the permit are true, accurate, and complete. (DBOH 030.020.A.2.c.(14))
- T. Compliance Plan** – A significant permit revision or a renewal for a source that is not in compliance at the time the application is submitted, shall include a compliance plan to address the non-compliant issue(s). The plan shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any requirements that the source is not in compliance with at the time of permit issuance. Any such plan shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. (DBOH 030.200.C.5.j, DBOH 030.200.D.1.m)
- U. Notifications** – The owner or operator shall furnish the Control Officer written notification of: (DBOH 030.200.D.1.w)
1. The date that construction or reconstruction is commenced, postmarked no later than thirty (30) calendar days after such date.
  2. The anticipated date of initial start-up, postmarked not more than sixty (60) calendar days and not less than thirty (30) calendar days before such date.
  3. The actual date of initial start-up, postmarked within fifteen (15) calendar days after such date.
- V. Alternate Operating Scenarios** – The owner or operator may make changes among reasonably anticipated operating scenarios identified in its application, as approved by the Control Officer. Such terms and conditions shall require the source: (DBOH 030.200.D.1.1)
1. To record in a log at the permitted facility, while making a change from one operating scenario to another, the scenario under which the facility is operating.

2. For each such alternative operating scenario, to comply with all applicable requirements and the requirements of DBOH Regulations PART 030.200.

**W. Additional Conditions** – The Control Officer may impose additional conditions necessary to ensure compliance with any applicable requirement. (DBOH 030.200.D.1.x)

**X. Yearly Reports, Annual Emissions** - The owner or operator may be required to submit reports including, but not limited to, throughput, production, fuel consumption, hours of operation, emissions, emission factors and calculations used to determine the reported emissions from each permitted emissions unit for the previous calendar year. If requested, these reports shall be submitted to the Control Officer for all emissions units/systems specified on the Permit to Operate, and shall be submitted no later than March 31 annually for the preceding calendar year (DBOH 030.040 B.13)

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## II. Facility-Wide Provisions

**A. Facility-Wide Emissions Limits.** The following quantities of emissions are the facility's allowable emissions based upon the source's potential to emit, as determined by the physical and operational design of the equipment and any practically enforceable permit conditions that limit the emissions of the source based on use of emissions control equipment, controlled operating rates, hours of operation, or other emissions control methods. The following quantities are used to determine annual permit maintenance fees and are enforceable emissions limits: (DBOH 030.010.A)

1. The discharge of PM<sub>10</sub> to the atmosphere shall not exceed 18.78 tons per year.
2. The discharge of PM<sub>2.5</sub> to the atmosphere shall not exceed 18.78 tons per year.
3. The discharge of sulfur dioxide to the atmosphere shall not exceed 0.05 tons per year.
4. The discharge of nitrous oxides to the atmosphere shall not exceed 8.76 tons per year.
5. The discharge of carbon monoxide to the atmosphere shall not exceed 7.36 tons per year.
6. The discharge of volatile organic compounds to the atmosphere shall not exceed 77.59 tons per year.

**B. Monitoring and Recordkeeping.** Sources seeking exemption from Title V as a synthetic minor source shall maintain the following records of operation sufficient to calculate actual emissions annually. Such information shall be summarized in a monthly log, maintained on site for five years, and be made available to the Control Officer upon request. (DBOH 010.090 E)

1. The owner or operator shall calculate and record, in a contemporaneous log, calculated total PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emissions for all emissions sources each calendar month, in tons, based on fuel consumption for natural gas combustion sources, pounds of pentane consumed, and hours of operation using the equations and emissions factors identified in the owner or operator's synthetic minor application or other AQMD-approved method. Records shall be maintained on site for a period of at least five years and shall be made available to AQMD representatives upon request.
2. The owner or operator shall calculate 12-month rolling total facility-wide estimated emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC for each calendar month in ton(s) per year. Emissions totals shall be available within 60 days of the end of a month. The owner or operator shall total PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emissions as calculated for all sources identified in this permit to determine compliance with the regulated air pollutants facility-wide emissions limit.

**C. Reporting.** An annual report shall be submitted to the Northern Nevada Public Health Air Quality Management Division by March 31 of each year. This report shall include: (DBOH 010.090 E)

1. Once per year, the owner or operator shall report to AQMD the 12-month rolling total regulated air pollutants emissions recorded under the regulated air pollutants emissions calculation (condition II.B.1 of this permit) used to determine compliance with the regulated air pollutants facility-wide emissions limit. The report shall include, but is not limited to, all methods, equations, emissions factors, and sources for emissions factors not previously identified used to determine the 12-month rolling total regulated air pollutants emissions.
2. Together with the annual report, the owner/operator shall submit an annual certification of compliance, signed by the owner/operator's responsible official. The certification shall read:



"Under penalty of perjury, I certify the following: based on information and belief formed after reasonable inquiry, the owner/operator facility has been in compliance with the synthetic minor conditions for the following period of time: \_\_\_\_\_"

- D. Deviations.** Each owner or operator shall notify the Control Officer of any deviations from the requirements of a permit or these regulations within 15 calendar days. The report to the Control Officer shall include the probable cause of all deviations and any action taken to correct the deviations. (DBOH 030.040.A.1.d)

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### III. Specific Provisions

#### A. System A – Block Pre-Expander

- A.001 – Kurtz VSD-3000 Pre-Expander

##### 1. Air Pollution Equipment

- a. Emissions from A.001 shall be vented through a condenser into the Bead Conditioning Bag Storage Enclosure (System C). A fluidized bed loop on the block pre-expander, with the return routed directly to the input of the chiller loop, is operated for moisture removal and collection of pentane. (DBOH 030.200 D.1.x)

##### 2. Emissions Limits

- a. On or after the date of startup of A.001, the owner or operator shall not discharge into the atmosphere from A.001 the following pollutants in excess of the following specified limits: (DBOH 010.090.E)
  - (1) The discharge of volatile organic compounds to the atmosphere shall not exceed 19.9 tons per year.

##### 3. Operating Parameters

- a. The maximum allowable throughput rate for A.001 shall not exceed 3,000 pounds of expanded polystyrene (EPS) per any one-hour period. (DBOH 030.200 D.1.x)
- b. The owner or operator shall operate and maintain A.001 in accordance with the manufacturer's O&M manual. (DBOH 030.200 D.1.x)

##### 4. Monitoring, Reporting, and Recordkeeping Requirements

- a. The owner or operator, upon issuance of this permit, shall maintain in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate. (DBOH 030.200.D.1.d.(2))
  - (1) Monitor and record the throughput rate of EPS, in pounds, for A.001 on a daily basis.
  - (2) Monitor and record the throughput rate of EPS, in pounds, for A.001 on a twelve (12) month rolling total basis. The twelve (12) month rolling total throughput of EPS shall be determined as the sum of the monthly throughput of EPS for the preceding twelve (12) months.

**B. System B – Shape Pre-Expander**

- B.001 – Hirsch Preex 6000 Pre-Expander

**1. Air Pollution Equipment**

- a. Emissions from B.001 shall be vented through a condenser into the Bead Conditioning Bag Storage Enclosure (System C). (DBOH 030.200 D.1.x)

**2. Emissions Limits**

- a. On or after the date of startup of B.001, the owner or operator shall not discharge into the atmosphere from B.001 the following pollutants in excess of the following specified limits: (DBOH 010.090.E)
  - (1) The discharge of volatile organic compounds to the atmosphere shall not exceed 7.76 tons per year.

**3. Operating Parameters**

- a. The maximum allowable throughput rate for B.001 shall not exceed 1,170 pounds of EPS per any one-hour period. (DBOH 030.200 D.1.x)
- b. The owner or operator shall operate and maintain B.001 in accordance with the manufacturer's O&M manual for emissions-related components. (DBOH 030.200 D.1.x)

**4. Monitoring, Reporting, and Recordkeeping Requirements**

- a. The owner or operator, upon issuance of this permit, shall maintain in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate. (DBOH 030.200.D.1.d.(2))
  - (1) Monitor and record the throughput rate of EPS, in pounds, for B.001 on a daily basis.
  - (2) Monitor and record the throughput rate of EPS, in pounds, for B.001 on a twelve (12) month rolling total basis. The twelve (12) month rolling total throughput of EPS shall be determined as the sum of the monthly throughput of EPS for the preceding twelve (12) months.

**C. System C – Bead Conditioning Bag Storage Enclosure**

- C.001-C.018 – Bead Conditioning Bags

**1. Air Pollution Equipment**

- a. Emissions from C.001 through C.018, each, and the emissions captured from Systems A, B, D, and F, shall be ducted to the 10.5 mmBTU VOC control boiler H.001. (DBOH 030.200 D.1.x)

**2. Emissions Limits**

- a. On or after the date of startup of C.001 through C.018, the owner or operator shall not discharge into the atmosphere from C.001 through C.018 the following pollutants in excess of the following specified limits: (DBOH 010.090.E)

(1) The discharge of volatile organic compounds to the atmosphere shall not exceed 27.90 tons per year.

**3. Operating Parameters**

- a. The maximum allowable throughput rate for C.001 through C.018, each, shall not exceed 240 pounds of EPS per any one-hour period. (DBOH 030.200 D.1.x)
- b. The owner or operator shall operate and maintain C.001 through C.018, each, in accordance with the manufacturer's O&M manual. (DBOH 030.200 D.1.x)

**4. Monitoring, Reporting, and Recordkeeping Requirements**

- a. The owner or operator, upon issuance of this permit, shall maintain in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate. (DBOH 030.200.D.1.d.(2))

(1) Monitor and record the throughput rate of EPS, in pounds, for C.001 through C.018, each, on a daily basis.

(2) Monitor and record the throughput rate of EPS, in pounds, for C.001 through C.018, each, on a twelve (12) month rolling total basis. The twelve (12) month rolling total throughput of EPS shall be determined as the sum of the monthly throughput of EPS for the preceding twelve (12) months.

**D. System D – Block Mold**

- D.001 – Kurtz Block Mold

**1. Air Pollution Equipment**

- a. Emissions from D.001 shall be vented through a condenser into the Bead Conditioning Bag Storage Enclosure (System C). (DBOH 030.200 D.1.x)

**2. Emissions Limits**

- a. On or after the date of startup of D.001 the owner or operator shall not discharge into the atmosphere from D.001 the following pollutants in excess of the following specified limits: (DBOH 010.090.E)
  - (1) The discharge of volatile organic compounds to the atmosphere shall not exceed 1.52 tons per year.

**3. Operating Parameters**

- a. The maximum allowable throughput rate for D.001 shall not exceed 3,000 pounds of EPS per any one-hour period. (DBOH 030.200 D.1.x)
- b. The owner or operator shall operate and maintain D.001 in accordance with the manufacturer's O&M manual for emissions-related components. (DBOH 030.200 D.1.x)

**4. Monitoring, Reporting, and Recordkeeping Requirements**

- a. The owner or operator, upon issuance of this permit, shall maintain in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate. (DBOH 030.200.D.1.d.(2))
  - (1) Monitor and record the throughput rate of EPS, in pounds, for D.001, each, on a daily basis.
  - (2) Monitor and record the throughput rate of EPS, in pounds, for D.001, each, on a twelve (12) month rolling total basis. The twelve (12) month rolling total throughput of EPS shall be determined as the sum of the monthly throughput of EPS for the preceding twelve (12) months.

**E. System E – Shape Molds**

- E.001-E.006 – Shape Molds

**1. Air Pollution Equipment**

- a. Emissions from E.001 through E.006 shall be vented through a condenser into the Bead Conditioning Bag Storage Enclosure (System C). (DBOH 030.200 D.1.x)

**2. Emissions Limits**

- a. On or after the date of startup of E.001 through E.006, the owner or operator shall not discharge into the atmosphere from E.001 through E.006 the following pollutants in excess of the following specified limits: (DBOH 010.090.E)

- (1) The discharge of volatile organic compounds to the atmosphere shall not exceed 11.76 tons per year.

**3. Operating Parameters**

- a. The maximum allowable throughput rate for E.001 through E.006, each, shall not exceed 500 pounds of EPS per any one-hour period. (DBOH 030.200 D.1.x)
- b. The owner or operator shall operate and maintain E.001 through E.006, each, in accordance with the manufacturer's O&M manual for emissions-related components. (DBOH 030.200 D.1.x)

**4. Monitoring, Reporting, and Recordkeeping Requirements**

- a. The owner or operator, upon issuance of this permit, shall maintain in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate. (DBOH 030.200.D.1.d.(2))

- (1) Monitor and record the throughput rate of EPS, in pounds, for E.001 through E.006, each, on a daily basis.

- (2) Monitor and record the throughput rate of EPS, in pounds, for E.001 through E.006, each, on a twelve (12) month rolling total basis. The twelve (12) month rolling total throughput of EPS shall be determined as the sum of the monthly throughput of EPS for the preceding twelve (12) months.

## **F. System F – Hot Wire Cutters**

- F.001 – F.006 – Hot Wire Cutters

### **1. Air Pollution Equipment**

- a. Emissions from F.001 through F.006 shall be controlled by best operating practices. (DBOH 030.200 D.1.x)

### **2. Emissions Limits**

- a. On or after the date of startup of F.001 through F.006, the owner or operator shall not discharge into the atmosphere from F.001 through F.006 the following pollutants in excess of the following specified limits: (DBOH 010.090.E)

- (1) The discharge of PM<sub>10</sub> to the atmosphere shall not exceed 18.11 tons per year.
- (2) The discharge of PM<sub>2.5</sub> to the atmosphere shall not exceed 18.11 tons per year.
- (3) The discharge of volatile organic compounds to the atmosphere shall not exceed 0.56 tons per year.

### **3. Operating Parameters**

- a. F.001 through F.006, each, may operate 8,760 hours per calendar year. (DBOH 030.200 D.1.x)
- b. The owner or operator shall operate and maintain F.001 through F.006, each, in accordance with the manufacturer's O&M manual for emissions-related components. (DBOH 030.200 D.1.x)

### **4. Monitoring, Reporting, and Recordkeeping Requirements**

- a. The owner or operator, upon issuance of this permit, shall maintain in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate. (DBOH 030.200.D.1.d.(2))

- (1) Monitor and record the hours of operation for F.001 through F.006, each, on a daily basis.
- (2) Monitor and record the hours of operation for F.001 through F.006, each, on a twelve (12) month rolling total basis. The twelve (12) month rolling total hours of operation shall be determined as the sum of the monthly hours of operation for the preceding twelve (12) months.

**G. System G – Densifiers**

- G.001 – G.002 – Densifiers

**1. Air Pollution Equipment**

- a. Emissions from G.001 through G.002, each, shall be controlled by best operating practices. (DBOH 030.200 D.1.x)

**2. Emissions Limits**

- a. On or after the date of startup of G.001 through G.002, the owner or operator shall not discharge into the atmosphere from G.001 through G.002 the following pollutants in excess of the following specified limits: (DBOH 010.090.E)

(1) The discharge of volatile organic compounds to the atmosphere shall not exceed 7.71 tons per year.

**3. Operating Parameters**

- a. The maximum allowable throughput rate for G.001 through G.002, each, shall not exceed 167 pounds of EPS per any one-hour period. (DBOH 030.200 D.1.x)
- b. The owner or operator shall operate and maintain G.001 through G.002, each, in accordance with the manufacturer's O&M manual for emissions-related components. (DBOH 030.200 D.1.x)

**4. Monitoring, Reporting, and Recordkeeping Requirements**

- a. The owner or operator, upon issuance of this permit, shall maintain in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate. (DBOH 030.200.D.1.d.(2))

(1) Monitor and record the throughput rate of EPS, in pounds, for G.001 through G.002, each, on a daily basis.

(2) Monitor and record the throughput rate of EPS, in pounds, for G.001 through G.002, each, on a twelve (12) month rolling total basis. The twelve (12) month rolling total throughput of EPS shall be determined as the sum of the monthly throughput of EPS for the preceding twelve (12) months.



## H. System H – Boiler (VOC Control)

- H.001 – Hurst Series 500 Scotch Marine 10.5 MMBtu/hr boiler

### 1. Air Pollution Equipment

- a. Emissions from H.001 shall be controlled by best operating practices. (DBOH 030.200 D.1.x)

### 2. Emissions Limits

- a. On or after the date of startup of H.001, the owner or operator shall not discharge into the atmosphere from H.001 the following pollutants in excess of the following specified limits: (DBOH 010.090.E)
  - (1) The discharge of PM10 to the atmosphere shall not exceed 0.33 tons per year.
  - (2) The discharge of PM2.5 to the atmosphere shall not exceed 0.33 tons per year.
  - (3) The discharge of sulfur dioxide to the atmosphere shall not exceed 0.03 tons per year.
  - (4) The discharge of nitrous oxides to the atmosphere shall not exceed 4.38 tons per year.
  - (5) The discharge of carbon monoxide to the atmosphere shall not exceed 3.68 tons per year.
  - (6) The discharge of volatile organic compounds to the atmosphere shall not exceed 0.24 tons per year.

### 3. Operating Parameters

- a. H.001 may combust natural gas and the pentane emissions ducted from System C – Bead Conditioning Bag Storage Enclosure. (DBOH 030.200 D.1.x)
- b. The maximum allowable heat input rate for H.001 shall not exceed 10.5 MMBtu per any one-hour period, combusting a maximum of 10,000 cubic feet per hour of natural gas and pentane. (DBOH 030.200 D.1.x)
- c. The owner or operator shall operate and maintain H.001 in accordance with the manufacturer's O&M manual for emissions-related components. (DBOH 030.200 D.1.x)

### 4. Monitoring, Reporting, and Recordkeeping Requirements

- a. The owner or operator, upon issuance of this permit, shall maintain in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate. (DBOH 030.200.D.1.d.(2))
  - (1) Monitor and record the hours of operation for H.001 on a daily basis.
  - (2) Monitor and record the hours of operation for H.001 on a twelve (12) month rolling total basis. The twelve (12) month rolling total hours of operation shall be determined as the sum of the monthly hours of operation for the preceding 12-months.
  - (3) Monitor and record the consumption of natural gas, in cubic feet, for H.001, on a twelve (12) month rolling total basis. The twelve (12) month rolling total consumption of natural gas shall

be determined as the sum of the monthly consumption of natural gas for the preceding twelve (12) months.

- (4) The owner or operator, upon issuance of this permit, shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

## 5. Testing

- a. The owner or operator shall conduct performance testing on the exhaust stack of H.001 pursuant to the requirements below to determine capture and destruction efficiency of the control device at maximum operating capacity. The test must be completed as follows: (DBOH 030.040 A.2)
  - (1) The owner or operator must conduct performance testing every 5 years, to be conducted no sooner than October 1, 2025, but no later than June 3, 2026.
  - (2) Performance tests must be conducted under such conditions as the AQMD specifies to the owner or operator of the plant based on representative performance of the affected facility. The owner or operator shall make available to the AQMD such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown and malfunction must not constitute representative conditions of the performance tests unless otherwise specified in the applicable standard.
  - (3) The owner or operator shall give notice to the AQMD at least 30 days before the performance tests to allow the AQMD to have an observer present. A written testing procedure must be submitted to the AQMD at least 30 days before the performance test to allow the AQMD to review the proposed testing procedure. The notice may be submitted to [AQMDCompliance@nnp.org](mailto:AQMDCompliance@nnp.org).
  - (4) Results from performance tests shall be submitted to the AQMD within 60 days of the test date. The notice may be submitted to [AQMDCompliance@nnp.org](mailto:AQMDCompliance@nnp.org).
- b. **VOC** – The owner or operator of an affected facility subject to an emissions limit shall conduct a performance test as required and shall conduct subsequent performance tests as requested by the AQMD to determine proper function of the control device using the following procedures and reference methods: (DBOH 030.040 A.2.b)
  - (1) Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound (VOC) concentration. Method 18 in appendix A of 40 CFR Part 60 or Method 320 in Appendix A of 40 CFR Part 63 may be used in conjunction with Method 25A to speciate the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test shall be run for a minimum of one hour.

## **I. System I – Boiler (Natural Gas)**

- I.001 – Hurst Series 500 Scotch Marine 10.5 MMBtu/hr boiler

### **1. Air Pollution Equipment**

- a. Emissions from I.001 shall be controlled by best operating practices. (DBOH 030.200 D.1.x)

### **2. Emission Limits**

- a. On or after the date of startup of I.001, the owner or operator shall not discharge into the atmosphere from H.001 the following pollutants in excess of the following specified limits: (DBOH 010.090.E)
  - (1) The discharge of PM10 to the atmosphere shall not exceed 0.33 tons per year.
  - (2) The discharge of PM2.5 to the atmosphere shall not exceed 0.33 tons per year.
  - (3) The discharge of sulfur dioxide to the atmosphere shall not exceed 0.03 tons per year.
  - (4) The discharge of nitrous oxides to the atmosphere shall not exceed 4.38 tons per year.
  - (5) The discharge of carbon monoxide to the atmosphere shall not exceed 3.68 tons per year.
  - (6) The discharge of volatile organic compounds to the atmosphere shall not exceed 0.24 tons per year.

### **3. Operating Parameters**

- a. I.001 may combust natural gas. (DBOH 030.200 D.1.x)
- b. The maximum allowable heat input rate for I.001 shall not exceed 10.5 MMBtu per any one-hour period, combusting a maximum of 10,000 cubic feet per hour of natural gas. (DBOH 030.200 D.1.x)
- c. The owner or operator shall operate and maintain I.001 in accordance with the manufacturer's O&M manual for emissions-related components. (DBOH 030.200 D.1.x)

### **4. Monitoring, Recordkeeping, and Reporting**

- a. The owner or operator, upon issuance of this permit, shall maintain in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate. (DBOH 030.200.D.1.d.(2))
  - (1) Monitor and record the hours of operation for I.001 on a daily basis.
  - (2) Monitor and record the consumption of natural gas, in cubic feet, for I.001 on a daily basis.
  - (3) Monitor and record the hours of operation for I.001 while combusting natural gas on a twelve (12) month rolling total basis. The twelve (12) month rolling total hours of operation shall be determined as the sum of the monthly hours of operation for the preceding 12-months.
  - (4) Monitor and record the consumption of natural gas, in cubic feet, for I.001 on a twelve (12) month rolling total basis. The twelve (12) month rolling total consumption of natural gas shall

- be determined as the sum of the monthly consumption of natural gas for the preceding twelve (12) months.
- (5) The owner or operator, upon issuance of this permit, shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

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#### IV. Permit Authorization

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Date \_\_\_\_\_ Brandon Koyama  
Environmental Engineer II  
Air Quality Management Division  
Northern Nevada Public Health

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Date \_\_\_\_\_ Genine Rosa, MS  
Senior Air Quality Specialist  
Air Quality Management Division  
Northern Nevada Public Health