

AIR QUALITY MINOR SOURCE PERMIT TO CONSTRUCT

Permit No.: AAIR25-0001

Permit Issued To: MA Auto Body Shop
Physical Address: 625 Quincy St. Reno, NV 89512
Mailing Address: 625 Quincy St. Reno, NV 89512
Billing Address: 625 Quincy St. Reno, NV 89512
Responsible Official: Miguel Arias, Manager

Phone: (775) 247-6300

Permit to Construct Expiration:

The Permit to Construct (PTC) expires and is invalid (DBOH 030.020 A.6):

1. If the permittee does not commence construction within eighteen (18) months of the PTC date of issuance.
2. If the permittee commences construction and then ceases construction for a period of eighteen (18) months or longer.
3. If a complete application for a new Permit to Operate (PTO) or modification of an existing PTO is not submitted within twelve (12) months after initial start-up of the new source or modification.
4. Upon the issuance of a PTO.

Facility Description:

MA Auto Body Shop is a facility with surface coating equipment located in Hydrographic Area 087. This is a minor source of regulated air pollutants. This source consists of one (1) spray booth as an emissions unit. This source falls under Standard Industry Classification (SIC) code 7532, "Top, Body, and Upholstery Repair Shops and Paint Shops" and North American Industrial Classification System (NAICS) code 811121, "Automotive Body, Paint, and Interior Repair and Maintenance".

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 volatile organic compounds to the atmosphere shall not exceed 0.333 tons per calendar year.
2. The discharge of hazardous air pollutants to the atmosphere shall not exceed 0.198 tons per calendar year.

Facility Emissions Unit List:

System A: Surface Coating – Paint Booth

- A.001 – HD Spraybooth, LLC (M/N: ADD-142709-10L)

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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.i)

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)

II. Facility-Wide Provisions

A. Facility-Wide Emissions Limits

1. 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)
 - a. The discharge of volatile organic compounds to the atmosphere shall not exceed 0.333 tons per calendar year.
 - b. The discharge of hazardous air pollutants to the atmosphere shall not exceed 0.198 tons per calendar year.

B. Monitoring, Recordkeeping and Reporting

1. The owner or operator shall keep adequate records concerning pollutant emissions for any equipment or process for which the permit is issued. Owners and operators operating add-on 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. (DBOH 030.040.B.11)

C. Deviations

1. 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)

III. Specific Provisions

A. System A: Surface Coating – Paint Booth

- A.001 – HD Spraybooth, LLC (M/N: ADD-142709-10L)

1. Initial Notification Requirements. The owner or operator of each affected facility shall submit notifications for the construction and startup of the emissions units. These notifications shall be submitted using initial notification documents provided by the Control Officer. (DBOH 030.040 B.12)

- a. The Start of Construction Notification form notifying the date of construction or reconstruction commenced shall be submitted no later than thirty (30) calendar days after such date. This Notification shall be submitted to the Control Officer.
- b. The Startup Notification notifying the actual date of initial startup of the emissions units shall be submitted within fifteen (15) calendar days after such date.

2. Air Pollution Equipment

- a. Emissions from A.001 shall be controlled by best operating and maintenance practices. (DBOH 030.020.A.6.g)

3. Emissions Limits

- a. The owner or operator shall not discharge into the atmosphere from A.001 the following pollutants in excess of the following specified limits: (DBOH 030.020.A.6.g)
 - (1) 0.333 tons of volatile organic compounds per calendar year.
 - (2) 0.198 tons of hazardous air pollutants per calendar year.

4. Operating Parameters

- a. All surface coating operations must be conducted within a spray booth or other approved enclosure. (DBOH 030.020.A.6.g)
- b. Exhaust filters must be installed and must cover all openings at all times whether the booth is in use or not. (DBOH 030.020.A.6.g)
- c. Exhaust filters must be in good operating condition and must be changed as needed. (DBOH 030.020.A.6.g)
- d. Extra filters amounting to 20 percent of the number of filters normally in use shall be kept on site as spares for repair and maintenance. (DBOH 030.020.A.6.g)
- e. All spilled material must be cleaned up immediately. (DBOH 030.020.A.6.g)
- f. All containers of ink, paint, resin, and/or solvent must be stored in tightly sealed containers. (DBOH 030.020.A.6.g)
- g. All waste solvents must be stored in tightly sealed containers. (DBOH 030.020.A.6.g)
- h. Solvent laden rags must be stored in closed, fireproof containers. (DBOH 030.020.A.6.g)
- i. All surface coating operations must comply with 40 CFR Part 63 Subpart HHHHHH. (DBOH 030.020.A.6.g)

- j. All painters must be certified in accordance with 40 CFR 63 Subpart HHHHHH or become certified within 6 months of hire. (40 CFR 63.11173(f), (g))
- k. All spray guns used at this facility must be High Volume Low Pressure (HVLP) type guns or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed in 40 CFR 63 Subpart HHHHHH and is approved by the Control Officer. (40 CFR 63.11173(e)(3))
- l. All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. (40 CFR 63.11173(e)(2)(i))

5. Monitoring, Recordkeeping, and Reporting

- a. The owner or operator 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. All logs shall be made available to the Control Officer upon request. (DBOH 030.040.B.11)
 - (1) The owner or operator shall monitor and record the usage of all products used containing VOCs and/or HAPs, in gallons, on a calendar yearly basis.
 - (2) The owner or operator shall maintain a list of all VOC-containing materials (e.g., coatings, thinners, solvents) currently in use and document the VOC and HAP content, in pounds per gallon, of each material.
 - (3) The owner or operator shall maintain an SDS for all products containing VOCs and/or HAPs (e.g., coatings, thinners, solvents) currently in use.
- b. The owner or operator shall notify the Control Officer prior to any paint stripping operations involving the use of chemical strippers that contain methylene chloride (MeCl) per 40 CFR 63 Subpart HHHHHH. (DBOH 030.020.A.6.g)
- c. The owner or operator shall notify the Control Officer prior to the use of any material containing the following metals: chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) per 40 CFR 63 Subpart HHHHHH. (DBOH 030.020.A.6.g)
- d. The owner or operator of a surface coating operation defined in 40 CFR 63 Subpart HHHHHH must keep the following records on site (40 CFR 63.11177):
 - (1) Certification of each painter.
 - (2) Documentation of the exhaust filter efficiency.
 - (3) Spray gun transfer efficiency documentation from the spray gun manufacturer.
 - (4) Copies of any compliance notification submitted to the Control Officer.

IV. Permit Authorization

Date

Chloe Dodge, MS
Air Quality Specialist
Air Quality Management Division
Northern Nevada Public Health

Date

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