

Air Quality Management Division General Information Authority to Construct / Permit to Operate

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I. Introduction

The goal of the Washoe County Health District, Air Quality Management Division (AQMD) is to keep Washoe County air as clean as possible. Since many industrial activities result in the release of contaminants into the air, air pollution control permits are needed for many businesses. The permit process ensures that with the start-up of a new project, or the modification of an existing project, air contaminants will be kept to a minimum and standards protecting the public health and environment will be maintained. Registration, permitting, and control of industrial sources of air pollution within Washoe County has been conducted by the Air Quality Management Division of the Washoe County Health District. Washoe County and the Truckee Meadows Basin within Washoe County have been declared “non-attainment” for Carbon Monoxide (CO) and Particulate Matter (PM₁₀) by the United States Environmental Protection Agency. Therefore Air Quality Control Regulations require that sources of air pollution emitting more than an average of 2.0 pounds per day of any air contaminant or any amount of hazardous air contaminant (air toxic) must obtain an Authority to Construct prior to construction or installation, and then continue to maintain a Permit to Operate. As the main goal of the Air Quality Management Division is to promote a clean and healthful environment for the citizens of Washoe County, we encourage the cooperative effort of business and industry with the AQMD and other resources, such as the Business Environmental Program (please see section XII of this packet). Together, business and government can cooperate to promote both economic viability and healthful conditions in our communities.

II. Industrial Operations Which Require Registration Include:

- A. Gas, oil or solid fuel burning boilers, furnaces or ovens greater than 2 million BTU aggregate (total capacity)
- B. Commercial fuel storage facilities or gas stations
- C. Paint and surface coating operations
- D. Degreasers, dry cleaners or other processes using solvents
- E. Aggregate, concrete or mineral products processing or mining
- F. Analytical labs, chemical processing operations, essay labs
- G. Printing press facilities
- H. Sawing, grinding or sanding operations
- I. Remediation soil or water treatment operations
- J. Restaurants with char broilers or large frying operations
- K. Industrial facilities which emit air pollutants
- L. Processes which have the potential to emit any of the substances on the District air toxic list (The District uses the same list as used in the Federal Clean Air Act, [see Sec. 112 (b)], or please contact AQMD for a copy of that list)

III. Explanation of Application Process

Enclosed with this information packet is the necessary form to apply for Authority to Construct Authorization. The Authority to Construct /Modify and/or Permit to Operate form is the required business administrative information. Not every item on this form is applicable to all facilities. In order to complete the application review process, we will need additional or more specific information on facility processes such as manufacturer guarantee of control device efficiency, flow diagrams of plant processes, detailed descriptions of production and operating parameters, etc. The following is a general listing of additional information, which may need to be attached to the general application form (not every item listed below applies to every facility, but be sure to attach additional information and complete whatever items are applicable):

A. Describe the General Purpose of the Facility

Facilities will need to submit a block flow diagram which identifies all equipment in the process, how material is transferred through facility, products and possible sources of air pollutants between process lines. Describe all process operations and their function in the plant production scheme. State which processes are continuous, which batch type processes are and which are used on only an intermittent basis.

1. Process Type

In one to three words describe the process type. You can choose from the process types discussed in section II or if your facility is not described use your own type description.

2. Process Description

Submit a listing of process equipment stating use, the materials entering and leaving the equipment, rated capacity, and energy consumption. Include:

- a. Operating schedule (hours/day, days/week, weeks/year)
- b. Average expected annual production rates
- c. Maximum monthly and daily production rates
- d. A list of raw materials consumed in the production process including chemicals, fuels, paints, solvents, etc.-- Attach MSDS or product information sheet for each material
- e. Quantities of all listed raw materials consumed on a weekly, monthly or annual basis

3. Equipment list (see example spreadsheet)

Include a list of all equipment, include the following:

- a. Equipment type (i.e. crusher or extruder, etc..)
- b. Manufacturer
- c. Size (i.e. 3 million BTUs, or 6 ton/hr)
- d. Model Number
- e. Serial Number
- f. Anticipated through put

4. Materials List (see example spreadsheet)

Include a list of all materials, include the following:

- a. Material type (i.e. auto paint or HDPE pellets, etc..)
- b. Manufacturer
- c. VOC Content
- d. Toxics content
- e. Anticipated through put

5. Modifications

- a. Identify process, equipment or materials that are changing
- b. Describe how process, equipment or materials are changing
- c. Include the above discussed descriptions or lists as a guidance as to the needed information

B. Process Emissions

1. Emission Points

If process emission data originates from a particular emission point, i.e., a stack, the following information on that emission point must be submitted:

- a. Height of the outlet above ground level
- b. Size and shape of the outlet
- c. Flow rate of exhaust gasses

- d. Outlet temperature
- e. Identification of all equipment ducted to each emission point

2. Emission Controls

If emission control equipment is to be used include a description of each control which process or equipment the unit will control emissions from and the manufacture control efficiency.

3. Emission Quantities

Provide data on the process emissions for all criteria and non-criteria pollutants-- estimate the quantity of each pollutant emitted, i.e., Total Suspended Particulate Matter (TSP), Carbon Monoxide (CO), Volatile Organic Compounds (VOC), Nitrogen Oxides (NO_x), Sulfur Oxides (SO_x), Hazardous Air Pollutants (HAPS) (as per District List of Air Toxics). For particulate matter include data on the chemical nature of the emissions. Attach a copy of the calculations, test methods, and/or assumptions made in estimating emissions. If outside references are used (such as the EPA reference document Compilation of Air Pollutant Emission Factors, AP-42) be sure to note where in the reference document the information was obtained. If you are not able to provide this information leave this section blank.

IV. Review of Application

If any necessary information is lacking in the submittal, a letter will be sent specifying what additional information is required to complete the review. A typical application review time can range from two (2) weeks for smaller operations who submit all necessary information initially, to three (3) months for large industrial pollution sources. Sources needing PSD, NSR or Title V permits may take six (6) to eighteen (18) months. Be sure to allow sufficient time for your application to be reviewed. If you have any questions during the application process, please contact the AQMD. Properly completed forms, with all necessary information, will result in speedier processing of your application.

Once the necessary information has been received, your application will be reviewed for compliance with local, state and federal air quality regulations

If there are any significant changes to your proposed project after you submit the application, you must contact the AQMD and inform us of the changes as soon as possible. Conditions for your Authority to Construct will be based upon the information you provide, therefore, if something changes, our office needs to know so that the project remains in compliance.

V. Specific Regulations or Emissions Limitations

Though the county does not have any set maximum pollutant emission rate thresholds beyond federal limitations, we do require the use of specific emission control devices in many cases.

A. New source with emissions between 10 lbs/day and 125 lbs/day (Washoe County Regulation Section 030.750) are required to apply Best Available Control Technology (BACT). A case-by-case review will be made to determine the appropriate BACT requirement.

B. New sources with emissions of 125 lbs/day or greater (Washoe County Regulation Section 030.700) are required to apply Lowest Achievable Emission Rate (LAER) control technology. A case-by-case review will be made to determine the LAER control requirements.

C. Special requirements for Hazardous Air Pollutants may also be necessary (Washoe County Regulation Section 030.410) The District uses the same list of hazardous air pollutants as does the Federal Environmental Protection agency.

D. New large sources (Major) emitting between 70 and 100 tons/yr. or more of a pollutant may fall under the regulations for Prevention of Significant Deterioration (PSD) or New Source Review (NSR). The Washoe County Air Quality Management Division (WC AQMD) has federal designation for PSD and NSR so these types of permits will be processed by AQMD.

E. For new Major industrial sources of air pollution, within any non-attainment area, pollutant offsets may be required. Offsets for CO and PM₁₀ are not normally required in the outlying areas beyond the Truckee Meadows Basin. Offsets for Ozone may be required in outlying areas as the entire county is designated as a non-attainment zone for that substance. Additional details on offset rules and requirements for large pollution sources may be obtained by contacting AQMD.

VI. Pre-Construction Conference

Because of the complexity of the details of some projects, many operators request a pre-construction conference to meet and discuss the details of the proposed project. The AQMD encourages such meetings, especially for more complex sources. Often such a discussion actually speeds up the permit process and results in less confusion for all parties. If you decide to pursue this option further, you should contact one of the WC AQMD staff members listed in section XII of this information packet.

VII. New Construction and Grading

A Dust Control Permit must be submitted on any new construction which will disturb an area one (1) acre or greater. The form for the Dust Control Permit can be obtained at www.ourcleanair.com or by calling the WC AQMD at (775) 784-7200. The plan generally describes the methods that will be used by the contractor to control fugitive dust emissions. A Dust Control Permit should only be submitted along with the Authority to Construct application if the soil disturbance from the construction of the proposed project will exceed the one (1) acre or greater criteria.

VIII. Application Fees

Before making any payments, please contact our office to determine the actual amount owed at 784-7200.

A. Point Source Application Fees

The Plan Review Fee, which must be submitted with a completed Application form, is **\$1,165** for sources emitting less than one hundred (100) tons per year total of any air contaminant, and **\$38,166** for major sources emitting over one hundred (100) tons per year total of any air contaminant. *The Fee for Synthetic Minor Sources emitting less than 100 tons per year of any air contaminant is \$3,458.*

B. Dust Control Permit Review Fees

The Dust Control Permit Review Fee is **\$237** per acre for projects one (1) acre or greater, **plus an administrative fee of \$87**.

* Please make checks payable to: WCHD (Washoe County Health District) *

IX. Air Quality Authority to Construct

When the application review has been completed, an Authority to Construct letter from the WC AQMD authorizing construction or installation of your proposed facility will be sent out. The letter will list the operational requirements and emission limitations that will be required as conditions of the Air Quality Permit to Operate. Assuming you have already acquired all other necessary agency authorizations and permits, you may begin construction of your project.

X. Permit to Operate

When construction or installation is complete, the operator must contact WC AQMD to arrange for an on-site inspection of the facility in operation to ensure that it meets the conditions set forth in the Authority to Construct letter. If the facility is in compliance an official Permit to Operate may be issued after the Permit to Operate fee has been paid. This permit must be renewed annually.

A. Permit to Operate Fees

The annual fees for renewal of the Permit to Operate are calculated as follows:

The Permit to Operate Fee for facilities emitting less than 2 pounds per day on an annual daily average is **\$341** administrative fee.

The Permit to Operate Fee for facilities emitting greater than 2 pounds per day on an annual daily average is **\$18** per average pound emitted per day, plus a **\$375** administrative fee. For example, a source that emits an average of eight (8) pounds per day would be charged as follows:

$8\{\text{lbs/day}\} \times \$18 \text{ [or } \$144] + \$375 = \$519 \text{ per year.}$

Hazardous Material Processes Fee or Air Toxic Fee, if applicable, is in addition to the stationary source Permit to Operate Fee, and is **\$8** per average pound emitted per day of a toxic air pollutant, plus a \$159 administrative fee. For example, a source that emits an average of 8 pounds per day total and 2 pounds are considered air toxic substances will be charged as follows:

$2\{\text{lbs/day}\} \times \$8 \text{ [or } \$16] + \$159 = \$185 + \text{Permit to Operate Fee of } \$375 = \$560.$

XI. Further Questions and Information

Copies of the Washoe County Health District Regulations Governing Air Quality Management are available.

For those applicants wishing to obtain general information on business space availability, lease or rental information, labor costs and general business climate in the Northern Nevada area, you may contact the Economic Development Authority of Western Nevada at (775) 829-3720. If you have any further questions, need additional information or need assistance in completing this application, you may contact Mike Wolf or Charlene Albee of the WC AQMD. Our phone

number is (775) 784-7200, our fax number is (775) 784-7225, or you may write to us at 1001 East Ninth Street B171, Reno, NV 89512.

XII. Additional Informational and Educational Resources

The Business Environmental Program, operated through the University of Nevada, is a free and confidential program designed to help businesses in Nevada minimize waste and comply with State and Federal environmental regulations. This is a service sponsored by the Nevada Small Business Development Center, Bureau of Business and Economic Research, College of Business Administration at the University of Nevada, Reno. This service may be contacted at (775) 784-1717 or (800) 882-3233. The Business Environmental Program may provide information and assistance on a number of topics, including hazardous waste regulatory assistance, air pollution emissions assistance, waste minimization and pollution prevention. They can also provide assistance in making application for permits or reviewing options for emission control equipment.

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