

AIR QUALITY MANAGEMENT DIVISION

1001 East Ninth Street | P.O. Box 11130 | Reno, Nevada 89520 | 775-784-7200 | OurCleanAir.com



Permit # (Record ID Number)

Permit Expiration Date – (Permit Expiration Date)

Permit Issued To: *(Text Label)*

Business Name : *(Contact Type “Business Name”)*

Address: *(Address)*

DESCRIPTION

This general permit has been developed for air curtain incinerator (ACI) facilities. An ACI is an incineration unit operating by forcefully projecting a curtain of air across an open, integrated combustion chamber (fire box) or open pit or trench (trench burner) in which combustion occurs. ACIs covered under this general permit may only burn wood waste, clean lumber, yard waste, or a mixture of all three, depending on the restrictions of the subpart applicable to the ACI. ACIs can be stationary or mobile, and the permit does not allow stationary engines. An ACI is subject to 40 C.F.R. Part 60 Subpart EEEE and required to obtain a Title V permit regardless of whether the emissions from the source would otherwise qualify as a minor source. The facility may use nonroad engines that are exempt from stationary source regulation under the Clean Air Act definition of a stationary source. These engines cannot stay in the same location for more than 12 months or will lose the exemption.

APPLICABILITY

This Title V General Operating Air Permit is available to all facilities which operate one or more air curtain incinerators that meet the requirements of this permit. This permit is one permitting option available to such facilities. The requirements of this Title V General Operating Air Permit are only applicable to those facilities which apply for and obtain this permit. Any incinerators operating within Washoe County are required to be permitted and as such are subject to the requirements contained in those respective permits. [District Regulation 030.900]

INSIGNIFICANT ACTIVITIES

The permittee must submit a list of activities which may be considered insignificant in Washoe County District Board of Health Regulations Governing Air Quality Management (District Reg) 030.900 (A)(1)(B)(3). The AQMD will document these activities in the Confirmation Letter if the insignificant activities are recognized.

Annual Reporting Requirements:

1. Annual engine fuel consumption
2. Type of material combusted
3. Quantity (in tons) of material combusted

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GENERAL PROVISIONS

1. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 C.F.R. 70.6(a)(2)]
2. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 C.F.R. 70.6(a)(1)(ii)]
3. The permittee must maintain the following records of monitoring information as required by this permit.
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement. [40 C.F.R. 70.6(a)(3)(ii)(A)]

“THE CONDITIONS OF OPERATION LISTED ON THIS PERMIT SUPERCEDE ALL PREVIOUS PERMIT CONDITIONS”

“CONDITIONS OF OPERATION”

- A. This permit becomes void upon any change of ownership or address or any alteration of permitted equipment.
- B. The permit shall be posted on or near the equipment listed above. The permit shall be readily available at all times while the equipment is operating.
- C. Any modification of the equipment listed above other than normal repair and maintenance will require a new Permit.
- D. Any records of operation which effect the potential of the source to emit air pollutants, such as fuel or products consumed, products produced, hours of operation, chemicals or supplies used in source operation, must be maintained for a period of at least 5 years and made available to the control officer upon request.
- E. All upset or breakdown conditions resulting in increased emissions or air pollutants shall be reported in compliance with District Regs 020.075 and 020.076.
- F. The control officer will be provided access to the facility to inspect operations and equipment covered under this permit whenever necessary to determine compliance with this permit and any other air pollution limitations specified in District regulations.
- G. The operator will not discharge or cause the discharge of odorous emissions which result in confirmed violations of District Reg 040.055. Upon confirmation of a violation of the odor regulation, the operator must submit a plan to reduce the odorous emissions within 30 days of Notice by the Control Officer.
- H. The annual throughput/consumption figures must be submitted in writing to the AQMD no later than the 20th of the month, approximately 6 weeks prior to the expiration date of the permit.

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Additional Permit Conditions: 40 C.F.R. Part 60 Subpart EEEE

1. The permittee is subject to 40 C.F.R. Part 60 Subpart EEEE if the facility's air curtains are very small municipal waste combustion units (less than 35 tons per day capacity) and institutional waste incineration units [40 C.F.R. 60.2886 (a) and 60.2888]. The permittee may only burn either 100 percent wood waste, 100 percent clean lumber, 100 percent yard waste, or 100 percent mixture of only wood waste, clean lumber, and/or yard waste. Clean lumber means wood or wood products that have been cut or shaped and include wet, air-dried, and kiln-dried wood products. Wood waste means untreated wood and untreated wood products, including tree stumps (whole or chipped), trees, tree limbs (whole or chipped), bark, sawdust, chips, scraps, slabs, millings, and shavings. Wood waste does not include (1) Grass, grass clippings, bushes, shrubs, and clippings from bushes and shrubs from residential, commercial/retail, institutional, or industrial sources as part of maintaining yards or other private or public land or (2) construction, renovation, or demolition wastes or clean lumber. Clean lumber does not include wood products that have been painted, pigment-stained, or pressure-treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote. Yard waste is grass, grass clippings, bushes, shrubs, and clippings from bushes and shrubs from residential, commercial/retail, institutional, or industrial sources as part of maintaining yards or other private or public lands. Yard waste does not include construction, renovation, or demolition wastes and clean wood. [40 C.F.R. 60.2970 (b)]
2. The permit holder may use this equipment at multiple locations within Washoe County providing that AQMD be notified in writing at least 10 working days prior to the relocation of this equipment within Washoe County.
 - a. The notification must specify the new location, type of equipment with a flow diagram if necessary, estimated production and length of time the equipment will be located at the specified location;
 - b. The proposed relocation does not violate Federal or local regulations or any conditions within this permit.
[40 C.F.R. 70.6 (e); District Reg 030.900 (D)(2)(g)]
3. Within 60 days after the air curtain incinerator reaches the charge rate at which it will operate, but no later than 180 days after its initial startup, the permittee must meet the following two limitations: a) The opacity limitation is 10 percent (6-minute average) in normal operation and b) The opacity limitation is 35 percent (6-minute average) during the startup period that is within the first 30 minutes of operation. [40 C.F.R. 60.2971]
4. The permittee must conduct an initial test for opacity as specified in 40 C.F.R. 60.8. After the initial test for opacity, the permittee must conduct annual tests no more than 12 months following the date of the previous test. If the air curtain incinerator has been out of operation for more than 12 months following the date of the previous test, the permittee must conduct a test for opacity upon startup of the unit. The permittee must use Method 9 of Appendix A of Part 60 to determine compliance with the opacity limitation. [40 C.F.R. 60.2972]
5. Prior to commencing construction on the air curtain incinerator, the permittee must submit a notification of intent to construct the air curtain incinerator, the planned initial startup date, and the types of materials that are planned to be burned in the air curtain incinerator. [40 C.F.R. 60.2973(a)]

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6. The permittee must keep records of results of all initial and annual opacity tests in either paper copy or computer-readable format that can be printed upon request for at least 5 years. The permittee must keep each record on site for at least 2 years. The permittee may keep the records off site for the remaining 3 years. The permittee must make all records available for submittal to the AQMD or for an inspector's review. [40 C.F.R. 60.2973 (b) and (c)]
7. The permittee must submit the results (each 6-minute average) of the initial opacity tests no later than 60 days following the initial test. Submit annual opacity test results within 12 months following the previous report. The permittee must submit the initial and annual opacity test reports as electronic or paper copy on or before the applicable submittal date. [40 C.F.R. 60.2973 (d), (e), and (f)]
8. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 C.F.R. 70.6(a)(3)(ii)(B)]
9. The permittee must submit reports of all required monitoring annually. The report is due on the twentieth day of the month six weeks prior to the annual permit expiration date. The first report due after issuance of the initial Title V permit shall contain six months of data and each report thereafter shall contain 12 months of data. The report shall contain data for all monitoring requirements in effect during the reporting period. If a monitoring requirement is not in effect for the entire reporting period, only those months of data in which the monitoring requirement was in effect are required to be reported. The report must clearly identify all instances of deviations from permit requirements. [40 C.F.R. 70.6(a)(3)(iii)(A)]
10. The permittee shall report to the AQMD all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in District Reg 020.075), the permittee will make an initial report to the AQMD by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location;
 - ii. The process unit or emission source deviating from the permit limit;
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
 - iv. The date and time the deviation started;
 - v. The duration of the deviation;
 - vi. The emissions during the deviation;
 - vii. The probable cause of such deviations;
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
 - ix. The name of the person submitting the report.
 - b. For all deviations, the permittee shall report such events in the annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 10a above. The semi-annual report must include all the information as required by the initial and full reports required in 10a. [40 C.F.R. 70.6(a)(3)(iii)(B)]

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11. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Part 70 permit are declared to be separable and severable. [40 C.F.R. 70.6(a)(5)]
12. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 C.F.R. 70.6(a)(6)(i)]
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to halt or reduce activity to maintain compliance with the conditions of this permit. [40 C.F.R. 70.6(a)(6)(ii)]
14. The AQMD may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 C.F.R. 70.6(a)(6)(iii)]
15. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the AQMD may require the permittee to furnish such records directly to the Control Officer along with a claim of confidentiality. [40 C.F.R. 70.6(a)(6)(v)]
16. The permittee must pay all permit fees in accordance with the procedures established in District Reg 030.305. [40 C.F.R. 70.6(a)(7)]
17. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 C.F.R. 70.6(a)(8)]
18. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 C.F.R. 70.6(a)(9)(i)]
19. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless AQMD specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 C.F.R. 70.6(b)]
20. The permittee must allow an authorized representative of the AQMD, upon presentation of credentials, to perform the following: [40 C.F.R. 70.6(c)(2)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;

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- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually. If the permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due on the first day of the second month after the end of the reporting period. The permittee must also submit the compliance certification to the Administrator as well as to the AQMD. All compliance certifications required by this permit must include the following: [40 C.F.R. 70.6(c)(5)]
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the AQMD may require elsewhere in this permit or
 - f. 40 C.F.R. 70 (114)(a)(3) and (504)(b).
22. The permittee may request in writing and at least 30 days in advance, temporary emissions exemption and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written AQMD approval. Any such emissions shall be included in the facility's total emissions and reported as such. The AQMD may grant such a request, at its discretion under the following conditions: [40 C.F.R. 52 Subpart E]
 - a. Such a request does not violate a federal requirement;
 - b. Such a request is temporary in nature;
 - c. Such a request will not result in a condition of air pollution;
 - d. The request contains such information necessary for the AQMD to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
 - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
 - f. The permittee maintains records of the dates and results of such temporary emissions/testing.
23. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written AQMD approval. The AQMD may grant such a request, at its discretion under the following conditions: [40 C.F.R. 52 Subpart E]
 - a. The request does not violate a federal requirement;
 - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
 - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.