

DEFINITIONS

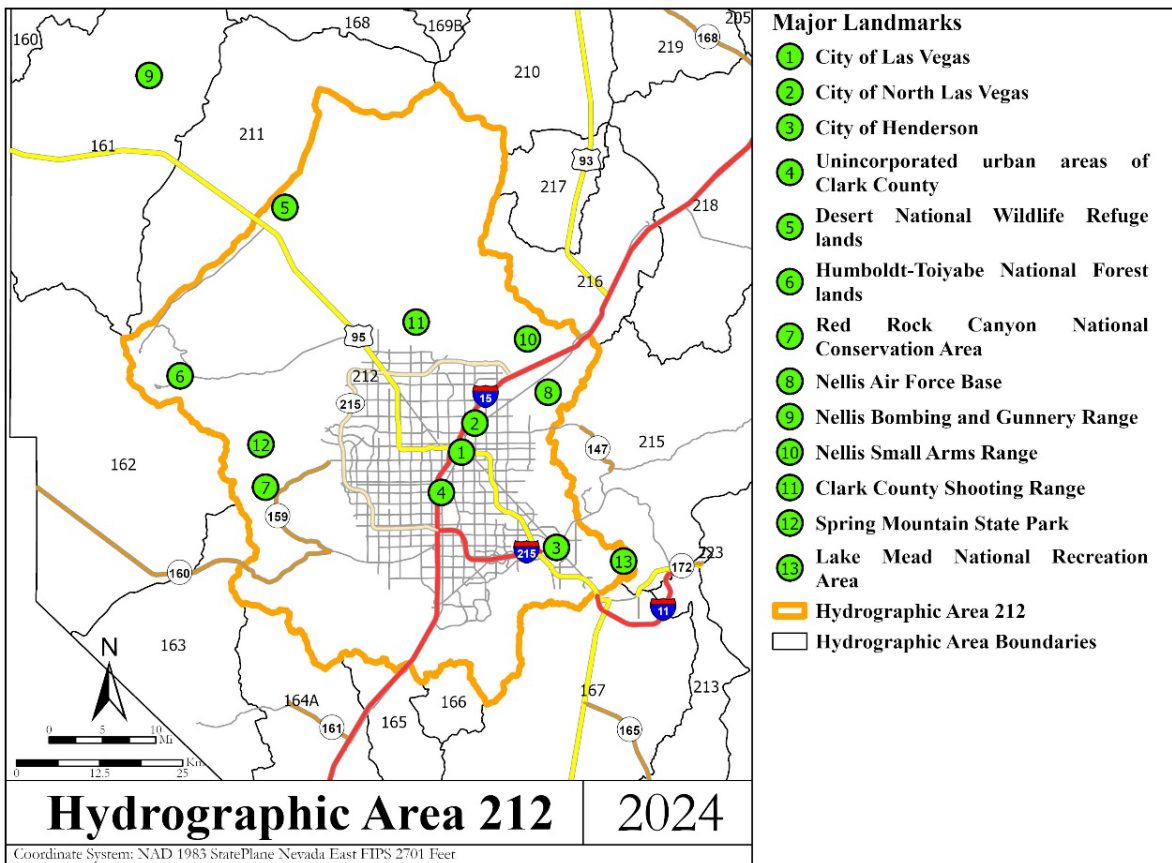
“Industrial adhesive operations” means the operation of one or more pieces of equipment used to apply, dry, and/or cure an adhesive or adhesive primer at a stationary source, along with all associated cleanup and storage operations (Section 101.3, “Definitions”).

“Projected maximum emissions” means the highest annual rate, in tons per year, at which the stationary source is projected to emit VOC based on anticipated production, throughput, heat input, or material utilization rates that does not include emission reductions from add-on controls (Section 101.3, “Definitions”).

“Stationary source” means any building, structure, facility, or installation that emits or may emit any regulated air pollutant (Section 0, “Definitions”).

AREA OF APPLICABILITY

The rule applies to an area known as Hydrographic Area 212 (HA212) which is roughly 1,500 square miles of the Las Vegas Valley (See map below). The rule also applies to any other area designated with a “moderate” or higher ozone nonattainment classification within Clark County on or after January 5, 2023.





CLARK COUNTY AIR QUALITY REGULATIONS

Section 101: VOC Emissions Control for Industrial Adhesive Operations Fact Sheet

April 2024

APPLICABILITY

Applicable

Section 101 is applicable to any owner or operator of a stationary source with projected maximum emissions (PME) of volatile organic compounds (VOC) **equal to or greater than 3.0 tons per calendar year** from industrial adhesive operations (Section 101.4 lists exemptions from parts of this rule).

Sections 101.6, 101.7(b)–(c), and 101.8–101.10 (on work practices (including periodic inspections and training) and registration, notification, and recordkeeping requirements) apply to any owner or operator of a stationary source with a PME of VOC of **less than 3.0 tons per calendar year** from industrial adhesive operations (Section 101.4 lists exemptions from parts of this rule).

Not Applicable

Based on Usage:

Section 101 is not applicable to stationary sources using less than 500 gallons of industrial adhesive materials per calendar year (Section 101.2(c)(1)).

Based on Activities:

Section 101 does not apply to the following activities (Section 101.2(c)(2)):

- Testing or evaluating adhesives or adhesive primers in a research and development, quality assurance, or analytical laboratory.
- Conducting tire repair operations if the label for the adhesive states, “For tire repair only.”
- Assembling, repairing, and manufacturing aerospace components or undersea-based weapons systems.
- Manufacturing medical equipment.
- Assembling fiberglass parts at fiberglass boat manufacturing facilities and other reinforced plastic composite manufacturing facilities when using polyester bonding putties.

EXEMPTIONS

Some provisions of Section 101 are not applicable based on usage of certain industrial adhesive materials (see Section 101.4). The accompanying [flow diagram](#) shows the criteria needed to claim an exemption and the sections that may still apply.

EMISSIONS STANDARDS FOR STATIONARY SOURCES WITH PME EQUAL TO OR GREATER THAN 3.0 TONS OF VOC PER YEAR

VOC emissions must be controlled by complying with one of the emissions standards outlined in Section 101.5:

- Reduce VOC emissions by at least 85% by weight;
- Use VOC-compliant coatings that meet the VOC content limits identified in the regulation and use one or more of the listed efficient application methods; or
- Use low-VOC industrial adhesives and an emissions control system (ECS) that, in combination, result in a mass VOC per volume that is no greater than the VOC-compliant coatings in Section 101.5(b) and use one or more of the listed efficient application methods in Section 101.5(d).



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If an owner or operator chooses to use an ECS, then an operations and maintenance plan must be developed per Section 101.7.1. In addition, ECS monitoring devices must be installed and maintained according to manufacturer specifications.

COMPLIANCE DATES

Document / Requirement	Due Date
Compliance dates for all applicable stationary sources	
Compliance with Section 101 for existing stationary source (Section 101.10(a))	No later than September 29, 2024, or when the stationary source commences normal operations or becomes subject to any requirements in Section 101, whichever is later
Compliance with Section 101 for new stationary source (Section 101.10(b))	Upon commencing normal operations
Owner or operator who already has a stationary source permit or is already complying with another SIP-approved regulation	
Permit revision instead of registration application (Section 101.8(d))	No later than September 29, 2024, or 45 days after becoming subject to any requirements in Section 101, whichever is later
Notice of exemption instead of registration application (Section 101.9.1(b))	Within 30 days of compliance date in Section 101.10
Compliance with Section 101.5, Control Officer's discretion on accepting alternative compliance date (Section 101.10(e))	No later than April 2, 2027
Registration and recordkeeping for all applicable stationary sources	
Registration application (Section 101.8(a)(1))	No later than September 29, 2024, or 45 days after becoming subject to any requirements in Section 101, whichever is later
Registration application revision update for material change (Section 101.8(a)(2))	Within 60 days of material change
Record retention (Section 101.9.2(a)(2))	5 years from creation
All records for review (Section 101.9.2(a)(3))	Upon request by Control Officer during hours of operation
Record volume of VOC-containing materials used in previous month (Section 101.9.2(a)(4))	Monthly
Record of emissions calculations (Section 101.9.2(a)(6))	Every calendar year
PME equal to or greater than 3.0 tons of VOC	
Registration revision if previous registration listed PME equal to or greater than 3.0 tons of VOC, but less than 3.0 tons of VOC were emitted and reported in each of the previous three consecutive calendar years (Section 101.8(c))	As applicable
Record of noncompliant industrial adhesive materials allowed per Section 101.4(b) (Section 101.9.2(b))	Monthly and annual total gallons or liters used



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Section 101: VOC Emissions Control for Industrial Adhesive Operations Fact Sheet

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Document / Requirement	Due Date
Annual emissions inventory (Section 101.9.3(b))	On or before March 31 of each year
Use of noncompliant materials in existing inventory (Section 101.10(c))	Until April 2, 2025, or 12 months after becoming subject to Section 101, whichever is later; cannot purchase new noncompliant materials after becoming subject to Section 101 unless allowed under 55-gal exemption
Compliance using ECS (Section 101.10(d))	September 24, 2025
If using a performance test to determine ECS control efficiency	
Conduct ECS performance test (Section 101.9.1(a)(1))	Within 180 days of initial operation or by September 29, 2024, whichever is later
Submit ECS performance test protocol (Section 101.9.1(a)(2))	At least 45, but no more than 90, days before anticipated test date
Submit performance test report to Control Officer (Section 101.9.1(a)(3))	60 days after test completed

RESOURCES

Forms and Worksheets:

- Calculation Worksheet – for calculating PME of VOC tons per calendar year to determine applicability (Section 101.2(a)-(b)).
- Registration Application (Section 101.8) – for all applicable sources required to comply with Section 101 described in the Applicability section (Section 101.2(a)-(b)).
- Notification Form (Section 101.9.1(b)) – for claiming an exemption from certain provisions of Section 101 (See Section 101.4 for exemption list).

The final rule is available on the department website at:

https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/division_of_air_quality/rules_regulations/current_aq_rules.php

Questions about these rules can be directed to the Department of Environment and Sustainability [Permitting Section](#) or the Small Business Assistance Program at: (702) 455-1660 or AQSBAP@ClarkCountyNV.gov.

REFERENCES

[Clean Air Act, Section 182\(b\)\(2\)\(A\), Title 42, U.S. Code Section 7511a \(42 U.S.C. 7511a\)](#)

[AQR Section 101, “VOC Emissions Control for Industrial Adhesive Operations”](#)

DISCLAIMER

This fact sheet is for general information and guidance purposes only. Do not rely solely on the information provided here as a basis for making any business, legal or any other decisions.