



# CLARK COUNTY AIR QUALITY REGULATIONS

## Section 103: VOC Emissions Control for Miscellaneous Metal or Plastic Parts Coating Operations Fact Sheet

April 2024

### DEFINITIONS

“Miscellaneous metal or plastic parts coating operations” means a process or processes of applying one or more coatings to metal or plastic parts or products, including components of such parts or products, and all associated cleaning operations. These operations are found at manufacturing facilities whose operations fall under Standard Industrial Classification codes 33–41, including, for example, manufacturers of:

- Fabricated metal products
- Molded plastic parts
- Farm machinery
- Commercial and industrial machinery and equipment
- Automotive or transportation equipment
- Interior or exterior automotive parts
- Construction equipment
- Motor vehicle accessories
- Bicycles and sporting goods
- Toys
- Recreational vehicles
- Pleasure craft
- Extruded aluminum structural components
- Railroad cars
- Heavier vehicles
- Lawn and garden equipment
- Business machines
- Laboratory and medical equipment
- Electronic equipment
- Steel drums
- Metal pipes, or
- Casino slot and gaming machines (Section 103.3, “Definitions”).

“Projected maximum emissions” (PME) 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 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.

### APPLICABILITY

#### Applicable

Section 103 is applicable to any owner or operator of a stationary source with PME of volatile organic compounds (VOC) **equal to or greater than 3.0 tons per calendar year** from miscellaneous metal or plastic parts coating operations (Section 103.4 lists exemptions from parts of this rule).

Sections 103.6, 103.7(b)–(c) and 103.8–103.10 (on work practices (including periodic inspections and training) and registration, notification, and recordkeeping requirements) are applicable to any owner or operator of a stationary source with a PME of VOC of **less than 3.0 tons per calendar year** from miscellaneous metal or plastic parts coating operations (Section 103.4 lists exemptions from parts of this rule).

#### Not Applicable

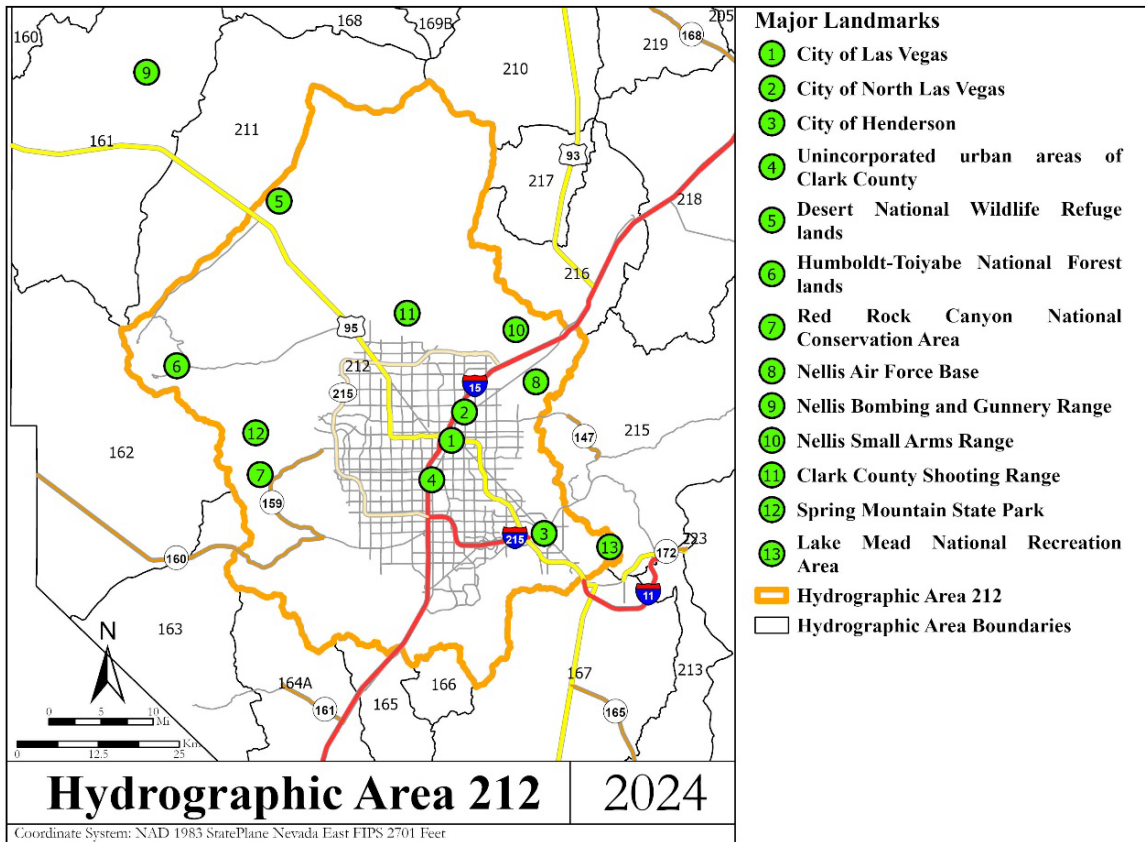
Per Section 103.2(c), Section 103 rules may not apply based on certain amounts of usage or activities:

- Section 103 is not applicable to stationary sources using less than 500 gallons (1,892 L) of coatings per calendar year (Section 103.2(c)(1)).
- Section 103 is not applicable when applying coatings to a test panel or coupon, or when using coatings in research and development, quality control, or performance evaluation activities (Section 103.2(c)(2)).

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### EXEMPTIONS

A stationary source may be excluded from portions of the regulation based on operations, usage, and materials (Sections 103.4(a-f)). See the accompanying [flow diagram](#) showing the criteria needed to claim an exemption and the regulations 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 103.5:

- Reduce VOC emissions from coating operations using an emission control system (ECS) that reduces VOC emissions by at least 90% by weight;
- Use VOC-compliant coatings that, as applied, meet VOC content limits for the applicable coating category and use one or more of the listed efficient application methods; or
- Use coatings that, as applied, have a VOC content equal to or less than the mass VOC per volume of the coating solids limit for the applicable coating category by using a combination of low VOC-containing material and an ECS and use one or more of the listed efficient application methods.

If an owner or operator chooses to use an ECS, then an operations and maintenance plan must be developed per Section 103.7.1. In addition, ECS monitoring devices must be installed and maintained according to manufacturer specifications.



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### COMPLIANCE DATES

Document / Requirement	Due Date
<b>Compliance dates for all applicable stationary sources</b>	
Compliance with Section 103 (Section 103.10(a))	No later than September 29, 2024, or when the stationary source commences normal operations or becomes subject to any requirements in Section 103, whichever is later
Compliance with Section 103 for new stationary source (Section 103.10(b))	Upon commencing normal operations
<b>Owner or operator who already has a stationary source permit or is already complying with another SIP-approved regulation</b>	
Permit revision instead of registration application (Section 103.8(d))	No later than September 29, 2024 or 45 days after becoming subject to any requirements in Section 103, whichever is later
Notice of exemption (Section 103.9.1(b))	Within 30 days of compliance date in Section 103.10
Compliance with Section 103.5; Control Officer's discretion on accepting alternative compliance date (Section 103.10(e))	No later than April 2, 2027
<b>Registration and recordkeeping for all applicable stationary sources</b>	
Registration application (Section 103.8(a)(1))	No later than September 29, 2024 or 45 days after becoming subject to any requirements in Section 103, whichever is later
Registration application revision update for material change (Section 103.8(a)(2))	Within 60 days of material change
Record retention (Section 103.9.2(a)(2))	5 years from creation
All records for review (Section 103.9.2(a)(3))	Upon request from Control Officer during hours of operation
Record of VOC-containing materials used in previous month (Section 103.9.2(a)(4))	Monthly
Record of emissions calculations (Section 103.9.2(a)(6))	Every calendar year
<b>PME equal to or greater than 3.0 tons of VOC</b>	
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 103.8(c))	As applicable
Annual emissions inventory (Section 103.9.3(b))	On or before March 31 of each year
Existing coatings inventory that does not meet the requirements of Section 103.5(b) (Section 103.10(c))	April 2, 2025 or 12 months after first becoming subject to Section 103, whichever is later
Compliance using ECS (Section 103.10(d))	September 24, 2025
<b>If using a performance test to determine ECS control efficiency</b>	
Conduct ECS performance test (Section 103.9.1(a)(1))	Within 180 days of initial operation or by September 29, 2024, whichever is later



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Document / Requirement	Due Date
Submit performance test protocol (Section 103.9.1(a)(2))	At least 45, but no more than 90, days before anticipated test date
Submit performance test report to Control Officer (Section 103.9.1(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 103.2(a)-(b)).
- Registration Application (Section 103.8) – for all applicable sources required to comply with Section 103 as described in the Applicability section (Section 103.2(a)-(b)).
- Notification Form (Section 103.9.1(b)) – for claiming an exemption from certain provisions of Section 103 (see Section 103.4 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](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](mailto: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 103, "VOC Emissions Control for Miscellaneous Metal or Plastic Parts Coating 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 business, legal, or any other decisions.