

COMPLIANCE ADVISORY: Evaporation and Leakage of Volatile Organic Compounds (VOC)

Federally Enforceable Emission Control Requirements for Degreasing Operations, Large Appliance Surface Coating Applications and General VOC Controls

This Compliance Advisory is intended for all currently active degreasing operations, surface coating operations for large appliances and general users of solvents or other volatile organic compounds operating with or without a current Air Quality permit in Clark County, Nevada.

On April 19, 2011, Clark County's Air Quality Board repealed Section 60 of the Clark County Air Quality Regulations (AQRs). Section 60 governed how affected operations used VOC-containing products, in some cases restricting their use. Since it was originally adopted as part of federally approved Clean Air Plans, the U.S. Environmental Protection Agency (EPA) has the authority to determine whether it should be retained. On January 14, 2016, the EPA disapproved Clark County's request to repeal Section 60. Therefore, control requirements and restrictive use provisions for cutback asphalts remain in effect and federally enforceable in Clark County.

The Department of Air Quality will address this conflict with federal law by re-establishing the requirements of Section 60 in the AQRs. Until these regulations are in place, **all active degreasers, surface coaters of large appliances and general users of volatile compounds shall employ the control measures and limitations specified in Section 60.** Failure to do so could result in an EPA enforcement action.

If you have any questions, or need more information, please contact our Small Business Assistance Program staff: John Richardson, (702) 455-3455, or Bill Gray, (702) 455-1624.

Sincerely,



Chuck Richter, Acting Compliance & Enforcement Manager

###

(see reverse for FAQs)

Frequently Asked Questions (FAQs)

Why is DAQ issuing this advisory?

In April 2011, Clark County's Air Quality Board repealed Section 60 of the AQRs. Section 60 governed how VOC-containing materials are used in Clark County and restricted some of their uses. In January 2016, EPA disapproved Clark County's request to repeal Section 60. Therefore, control measures and limitations for VOCs remain in effect and federally enforceable in Clark County.

What is an "enforcement action"?

EPA has the authority to take civil or criminal action against violators of environmental laws. These actions may result in expensive fines or, if the violation is serious enough, criminal charges.

What is a Degreasing Operation?

A solvent degreasing (or solvent cleaning) operation is one that uses organic solvents to remove grease, fats, oils, wax or soil from various metal, glass, or plastic items. Non-aqueous (i.e. without water) solvents such as petroleum distillates, chlorinated hydrocarbons, ketones, and alcohols are used. Examples of common degreasing operations are repair stations for roadway vehicles or electric tools. Major users of solvent degreasing include the metal working industry, such as automotive, electronics, plumbing, aircraft, refrigeration, and business machine industries. Solvent cleaning is also used in industries such as printing, chemicals, plastics, rubber, textiles, glass, paper, and electric power.

What is a Surface Coater of Large Appliances?

Large appliance surface coating operations are facilities that apply organic coatings to large appliance parts or products. Large appliances includes "white goods" such as ovens, refrigerators, freezers, dishwashers, laundry equipment, trash compactors, water heaters, comfort furnaces, and electric heat pumps that are manufactured for household, commercial, or recreational use. This category also includes most heating, ventilation, and air conditioning (HVAC) equipment with exception given to motor vehicle air-conditioning units, heat transfer coils, and large commercial and industrial chillers.

What is a General User of Solvents and other VOC Materials?

A general user of solvents and other materials containing VOC consist of various industrial, commercial and private applications. Examples of common general users include those engaged in auto body repair and media printing; however a large degree of these volatile compounds are also used by many manufacturers, chemical processes and service related industries.

As a Degreasing operation, what must I do?

You must make sure your degreasing processes comply with the requirements of Subsection 60.2 of the regulations. Requirements include, but are not limited to, applying solvents in a solid fluid state without



CLARK COUNTY • DEPARTMENT OF AIR QUALITY
4701 W. Russell Road Suite 200 • Las Vegas, NV 89118-2231
(702) 455-5942 • Fax (702) 383-9994
Marci Henson Director

spraying or atomization, storing degreasing solvents in labeled containers that are covered when not being transferred for use, and employing control devices for highly volatile or heated solvents such as enclosures, water covers and minimal freeboard.

As a Surface Coater of Large Appliances, what must I do?

You must make sure your surface coating processes comply with the requirements of Subsection 60.3 of the regulations. Requirements include utilizing low solvent coatings, or other control measures, as approved, such that the VOC being discharged into the atmosphere does not exceed 2.8 pounds per gallon of coating material (minus water).

As a General User of VOC Materials, what must I do?

You must make sure your general use of solvents or other volatile compounds comply with the requirements of Subsection 60.1 of the regulations. Requirements include preventing the discharge of these compounds into the ambient air through processing, storage, usage and transportation in such a manner and by such means that they will not evaporate, leak, escape or be otherwise discharged into the ambient air.

What are the next steps?

The Department of Air Quality will work with representatives from the regulated community, EPA, and state and local agencies to put the VOC control measures and limitations back into the AQRs. Please check www.clarkcountynv.gov/airquality regularly for updates.