

# CLARK COUNTY BOARD OF COMMISSIONERS

## AGENDA ITEM

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**Petitioner:** Marci Henson, Director, Department of Environment and Sustainability

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**Recommendation:**

**Conduct a public hearing and approve, adopt and authorize the Chair to sign an ordinance to create a new Clark County Air Quality Regulation Section 108, "VOC Emissions Control for Paper, Film, Foil, Fabric, or Vinyl Coating Operations," to regulate sources that may cause or contribute to volatile organic compound emissions within the 2015 ozone nonattainment boundary by implementing emissions standards, work practices, permitting or registration requirements, and recordkeeping and reporting requirements; and providing for other matters properly related thereto; and to authorize the Control Officer to compile and submit the approved ordinance and all related documentation, including the Technical Support Document, to the Nevada Division of Environmental Protection for U.S. Environmental Protection Agency approval into the Nevada State Implementation Plan. (For possible action)**

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**FISCAL IMPACT:**

Fund #:	N/A	Fund Name:	N/A
Fund Center:	N/A	Funded PGM/Grant:	N/A
Amount:	N/A		
Description:	N/A		
Additional Comments:	N/A		

**BACKGROUND:**

The proposed ordinance creates a new Clark County Air Quality Regulation (AQR) Section 108, which regulates volatile organic compound (VOC) emissions in paper, film, foil, fabric, and vinyl coating operations. This rule aims to help meet the 2015 ozone standards after the U.S. Environmental Protection Agency (EPA) reclassified the Las Vegas Valley from "moderate" to "serious" nonattainment for the 2015 Ozone National Ambient Air Quality Standard (NAAQS). The reclassification was effective January 21, 2025 (89 FR 103657), requiring the Department of Environment and Sustainability, Division of Air Quality (DAQ) to prepare an attainment plan addressing more stringent planning requirements. Section 182(b)(2)(A) of the Clean Air Act requires moderate-and-higher ozone nonattainment areas to implement Reasonably Available Control Technology (RACT) for all Control Techniques Guidelines (CTGs) to reduce VOC emissions. DAQ previously adopted rules for 10 out of the 11 identified CTG source categories and identified an additional source category; AQR 108 addresses the remaining categories.

AQR 108 applies to sources in the Las Vegas Valley. It incorporates RACT based on EPA guidelines and sets compliance deadlines aligned with the county's attainment plan. Owners or operators subject to AQR 108 must comply with applicable work practices and registration, notification, recordkeeping, and reporting requirements. Fabric or vinyl coating operations with projected maximum emissions of VOCs equal to or greater than 3.0 tons

Cleared for Agenda

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per calendar year (tpy), and paper, film, or foil coating operations with an uncontrolled potential to emit VOCs at equal to or less than 25 tpy, must also meet emissions standards. Sources with VOC emissions below 3.0 tpy are limited to work practice requirements for storing, handling, and disposing of coatings and waste materials, along with applicable recordkeeping and registration obligations.

The attached Technical Support Document provides context and explains the proposed new rule to facilitate enforcement required by the 2015 ozone SIP.