

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Proposed

MAJOR FACILITY REVIEW PERMIT

Issued To:

STRONGWELL
Facility #A2918

Facility Address:

615 North King Road
San Jose, CA 95133

Mailing Address:

615 North King Road
San Jose, CA 95133

Responsible Official

Wayne M. Schilling, Plant Site Manager

408-923-5333

Facility Contact

Wayne M. Schilling, Plant Site Manager

L. Bobby Balagot, EH & S Manager

408-923-5333

Type of Facility: Manufacturing of polymer
concrete products

Primary SIC: 3272

Product: Polymer concrete utility boxes

BAAQMD Engineering Permit
Division Contact: Dharam Singh

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Jack P. Broadbent, Executive Officer/Air Pollution Control Officer

Date

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I. STANDARD CONDITIONS

A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

- BAAQMD Regulation 1 - General Provisions and Definitions
(as amended by the District Board on 5/2/01);
- SIP Regulation 1 - General Provisions and Definitions
(as approved by EPA through 8/27/99);
- BAAQMD Regulation 2, Rule 1 - Permits, General Requirements
(as amended by the District Board on 8/1/01);
- SIP Regulation 2, Rule 1 - Permits, General Requirements
(as approved by EPA through 2/25/99);
- BAAQMD Regulation 2, Rule 2 - Permits, New Source Review
(as amended by the District Board on 10/7/98);
- SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration
(as approved by EPA through 2/25/99);
- BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking
(as amended by the District Board on 10/7/98);
- SIP Regulation 2, Rule 4 - Permits, Emissions Banking
(as approved by EPA through 2/25/99); and
- BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review
(as amended by the District Board on 5/2/01).

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit was issued on June 1, 2000 and expires on May 31, 2005. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than November 30, 2004 and no earlier than May 31, 2004. **If a complete application for renewal has not been submitted in accordance with this deadline, the facility may not operate after May 31, 2005.** (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)

I. Standard Conditions

4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
6. This permit does not convey any property rights of any sort, or any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District's Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)
11. The responsible official shall certify all documents submitted by the facility pursuant to the major facility review permit. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The certifications shall be signed by a responsible official for the facility. (MOP Volume II, Part 3, §4.11)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

E. Records

1. The permit holder must provide any information, records, and reports requested or specified by the APCO. (Regulation 1-441, Regulation 2-6-409.4)
2. Notwithstanding the specific wording in any requirement, all records for federally

I. Standard Conditions

enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

F. Monitoring Reports

Reports of all required monitoring must be submitted to the Bay Area Air Quality Management District at least once every six months, except where an applicable requirement specifies more frequent reporting. The first reporting period for this permit shall be June 1, 2000, to November 30, 2000. The report shall be submitted by December 31, 2000. Subsequent reports shall be for the following periods: December 1st through May 31st and June 1st through November 30th, and are due on the last day of the month after the end of the reporting period. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be June 1st. The certification shall be submitted by June 30th of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

H. Emergency Provisions

Revision date:

I. Standard Conditions

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. (MOP Volume II, Part 3, §4.8)
3. The granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)

I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

J. Miscellaneous Conditions

1. The maximum capacity for each source as shown in Table II-A is the maximum allowable capacity. Exceedance of the maximum allowable capacity for any source is a violation of Regulation 2, Rule 1, Section 301. (Regulation 2-1-301)

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S#	Description	Make or Type	Model	Capacity
5	Mixing and casting operations	Custom-built		
13	Aggregate Silo #1	Vertical/ cylindrical		60,000 pound
14	Aggregate Silo #2	Vertical/cylindrical		60,000 pound
15	Aggregate Silo #3	Vertical/cylindrical		60,000 pound

Table II B – Abatement Devices

A#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
3	Dust collection system (baghouse), North	S13, S14, A4 (S15)	BAAQMD 6-301		Ringelmann No. 1 for ≤ 3 minutes in any hour
			BAAQMD 6-310		0.15 gr/dscf
			Permit condition 16674, part 2		0.01 gr/dscf
4	Dust collector (baghouse), Pulse jet, Design "M" Model 2, w/filter media	S15			

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date.

The full language of SIP requirements is on the EPA Region 9 website at:

<http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisionsincluded in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement>

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. All sources must comply with both versions of the rule until US EPA has reviewed and approved the District's revision of the regulation.

**Table III
Generally Applicable Requirements**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (10/7/98)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y
BAAQMD Regulation 5	Open Burning (11/2/94)	N
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	Y
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	Y

III. Generally Applicable Requirements

**Table III
 Generally Applicable Requirements**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 8, Rule 3	Organic Compounds - Storage of Organic Liquids (1/20/93)	Y
BAAQMD Regulation 8, Rule 16	Organic Compounds - Solvent Cleaning Operations (9/16/98)	N
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (12/20/95)	N
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y
EPA Regulation 40 CFR 82	Protection of Stratospheric Ozone (2/21/95)	
Subpart F, 40 CFR 82.156	Leak Repair	Y
Subpart F, 40 CFR 82.161	Certification of Technicians	Y
Subpart F, 40 CFR 82.166	Records of Refrigerant	Y

IV SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parentheses in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors.
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of SIP requirements is on the EPA Region 9 website at: <http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions> ~~included in Appendix A of this permit if the SIP requirements are different from the current BAAQMD requirements.~~ All other text may be found in the regulations themselves.

Table IV - A
Source-specific Applicable Requirements
S5 - MIXING AND CASTING OPERATIONS

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (11/6/96)		
8-50-110	Limited Exemption, Touch-up and Repair	Y	
<u>8-50-220</u>	<u>Volatile Organic Compound (VOC)</u>	<u>N</u>	
8-50-301	Process Requirements	Y	
8-50-301.2	Resin containing vapor suppressant and VOC emission limit	Y	
8-50-304	Corrosion-resistant Materials	Y	
8-50-305	Surface Preparation and Clean-up Solvent	Y	
8-50-305.1	Storage in Closed Containers	Y	
8-50-305.2	Self-closing Containers, Disposal	Y	
8-50-305.3	Minimizing Organic Emissions from Spray Equipment Clean-up	Y	

IV SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

Table IV - A
Source-specific Applicable Requirements
S5 - MIXING AND CASTING OPERATIONS

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter	Y	
8-50-501	Records	Y	
8-50-501.1	List of Materials Used	Y	
8-50-501.2	List VOC Content of Materials Used	Y	
8-50-501.3	Vapor-suppressed Resin Records	Y	
8-50-501.4	Daily Usage Records	Y	
8-50-501.5	Record Retention for 24 months	Y	
<u>SIP</u> <u>8-50</u>	<u>Organic Compounds - Polyester Resin Operations (12/20/95)</u>		
8-50-220	Volatile Organic Compound (VOC)	Y	
<u>NESHAP</u> <u>Part 63</u> <u>Subpart A</u>	<u>National Emission Standards for Hazardous Air Pollutants for Source Categories</u>		
63.4	<u>Prohibited Activities and Circumvention</u>	Y	
63.6(e)	<u>Operation and Maintenance</u>	Y	
63.7	<u>Performance Testing Requirements</u>	Y	
63.8	<u>Monitoring Requirements</u>	Y	
63.9	<u>Notification Requirements</u>	Y	
63.10	<u>Recordkeeping and Reporting Requirements</u>	Y	
63.10(a)	<u>Applicability of recordkeeping and reporting</u>	Y	
63.10(b)(1)	<u>Records Retention</u>	Y	
<u>40 CFR 63</u> <u>Subpart</u> <u>WWW</u>	<u>National Emission Standards for Hazardous Air Pollutants:</u> <u>Reinforced Plastic Composite Production</u>	Y	April 21, 2006
63.5785	<u>Am I subject to this subpart?</u>	Y	April 21, 2006
63.5790	<u>What part of my plant does this subpart cover?</u>	Y	April 21, 2006
63.5790(c)	<u>Exclusion: polymer casting, etc.</u>	Y	October 24, 2005
63.5797	<u>How do I determine the organic HAP content of my resins and gel coats?</u>	Y	April 21, 2006
63.5805	<u>What standards must I meet to comply with this subpart?</u>	Y	April 21, 2006
63.5805(b)	<u>Work practice standards in Table 4</u>	Y	April 21, 2006
63.5835	<u>What are my general requirements for complying with this subpart?</u>	Y	April 21, 2006
63.5835(a)	<u>Work practice standards in Table 4</u>	Y	April 21, 2006
63.5840	<u>By what date must I conduct a performance test or other initial</u>	Y	April 21, 2006

IV SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

Table IV - A
Source-specific Applicable Requirements
S5 - MIXING AND CASTING OPERATIONS

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Table 2 (2)	<u>compliance demonstration?</u>		
63.5860	<u>How do I demonstrate initial compliance with the standards?</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5860(a)	<u>Tables 8 and 9</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5900	<u>How do I demonstrate continuous compliance with the standards?</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5900(a)(4)	<u>Work practice standards in Table 4</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5900(c)	<u>During startup, shutdown or malfunction – work practice standards in Table 4</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5905	<u>What notifications must I submit and when?</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5905 (a).	<u>Table 13</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5905(b)	<u>Report any change in notification within 15 days</u>		<u>April 21, 2006</u>
63.5910	<u>What reports must I submit and when?</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5910(a)	<u>Each applicable report in Table 14</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5910(b)	<u>By the date specified in Table 14 and as per this section</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5910(c)	<u>Content of the report</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5915	<u>What records must I keep?</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5915(a)	<u>Records as per this section</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5915(d)	<u>Compliance certification with work practice requirements in Ttable 4</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5920	<u>In what form and how long must I keep my records?</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5925	<u>What parts of the General Provisions apply to me?</u>	<u>Y</u>	<u>April 21, 2006</u>
63.5935	<u>What definitions apply to this subpart?</u>	<u>Y</u>	<u>April 21, 2006</u>
BAAQMD Condition #17170			
part 1	Annual resin solution throughput limit (basis: cumulative increase)	Y	
part 2	Styrene monomer content limit (basis: cumulative increase)	Y	
part 3	Vapor suppressant requirement (basis: Regulation 8-50-301.2)	Y	
part 4	Annual clean-up solvent usage limit (basis: cumulative increase; Regulation 8-50-305.4)	Y	
part 5	Materials and throughput recordkeeping (basis: cumulative increase; Regulation 2-6-501)	Y	

IV SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

Table IV - B
Source-specific Applicable Requirements
S13, S14, S15 - AGGREGATE SILOS - #1, #2, #3

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particle Weight Limitation	Y	
6-401	Appearance of Emissions	Y	
BAAQMD Condition #16674			
part 1	Annual aggregate material throughput limit (basis: cumulative increase)	Y	
part 2	Exhaust grain loading limit (basis: cumulative increase)	Y	
part 3	Baghouse annual inspection and recordkeeping (basis: Regulation 2-6-501)	Y	
part 4	Material throughput recordkeeping (basis: Regulation 2-6-501; cumulative increase)	Y	

Table IV - C
Source-specific Applicable Requirements
FACILITY

<u>Applicable Requirement</u>	<u>Regulation Title or Description of Requirement</u>	<u>Federally Enforceable (Y/N)</u>	<u>Future Effective Date</u>
<u>NESHAP Part 63 Subpart A</u>	<u>National Emission Standards for Hazardous Air Pollutants for Source Categories</u>		
<u>63.4</u>	<u>Prohibited Activities and Circumvention</u>	<u>Y</u>	
<u>63.6(e)</u>	<u>Operation and Maintenance</u>	<u>Y</u>	
<u>63.7</u>	<u>Performance Testing Requirements</u>	<u>Y</u>	
<u>63.8</u>	<u>Monitoring Requirements</u>	<u>Y</u>	
<u>63.9</u>	<u>Notification Requirements</u>	<u>Y</u>	

Revision date:

IV SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

Table IV - C
Source-specific Applicable Requirements
FACILITY

<u>Applicable Requirement</u>	<u>Regulation Title or Description of Requirement</u>	<u>Federally Enforceable (Y/N)</u>	<u>Future Effective Date</u>
63.10	Recordkeeping and Reporting Requirements	Y	
63.10(a)	Applicability of recordkeeping and reporting	Y	
63.10(b)(1)	Records Retention	Y	
40 CFR 63 Subpart WWW	National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composite Production	Y	April 21, 2006
63.5785	Am I subject to this subpart?	Y	April 21, 2006
63.5790	What part of my plant does this subpart cover?	Y	April 21, 2006
63.5790(c)	Exclusion: polymer casting.	Y	October 24, 2005
63.5797	How do I determine the organic HAP content of my resins and gel coats?	Y	April 21, 2006
63.5805	What standards must I meet to comply with this subpart?	Y	April 21, 2006
63.5805(b)	Work practice standards in Table 4	Y	April 21, 2006
63.5835	What are my general requirements for complying with this subpart?	Y	April 21, 2006
63.5835(a)	Work practice standards in Table 4	Y	April 21, 2006
63.5840, Table 2 (2)	By what date must I conduct a performance test or other initial compliance demonstration?	Y	April 21, 2006
63.5860	How do I demonstrate initial compliance with the standards?	Y	April 21, 2006
63.5860(a)	Tables 8 and 9	Y	April 21, 2006
63.5900	How do I demonstrate continuous compliance with the standards?	Y	April 21, 2006
63.5900(a)(4)	Work practice standards in Table 4	Y	April 21, 2006
63.5900(c)	During startup, shutdown or malfunction – work practice standards in Table 4	Y	April 21, 2006
63.5905	What notifications must I submit and when?	Y	April 21, 2006
63.5905 (a).	Table 13	Y	April 21, 2006
63.5905(b)	Report any change in notification within 15 days	Y	April 21, 2006
63.5910	What reports must I submit and when?	Y	April 21, 2006
63.5910(a)	Each applicable report in Table 14	Y	April 21, 2006
63.5910(b)	By the date specified in Table 14 and as per this section	Y	April 21, 2006
63.5910(c)	Content of the report	Y	April 21, 2006
63.5915	What records must I keep?	Y	April 21, 2006
63.5915(a)	Records as per this section	Y	April 21, 2006
63.5915(d)	Compliance certification with work practice requirements in Ttable	Y	April 21, 2006

Revision date:

IV SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

Table IV - C
Source-specific Applicable Requirements
FACILITY

<u>Applicable Requirement</u>	<u>Regulation Title or Description of Requirement</u>	<u>Federally Enforceable (Y/N)</u>	<u>Future Effective Date</u>
	<u>4</u>		
<u>63.5920</u>	<u>In what form and how long must I keep my records?</u>	<u>Y</u>	<u>April 21, 2006</u>
<u>63.5925</u>	<u>What parts of the General Provisions apply to me?</u>	<u>Y</u>	<u>April 21, 2006</u>
<u>63.5935</u>	<u>What definitions apply to this subpart?</u>	<u>Y</u>	<u>April 21, 2006</u>

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit on a timely basis.

VI PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

Condition #16674

For S13, S14, and S15, Aggregate Silos

1. The owner/operator shall maintain an ~~total combined~~ aggregate throughput ~~at all the three silos shall not exceed~~ of not to exceed 5875 tons per consecutive 12-month period. (basis: cumulative increase)
2. The owner/operator shall ensure a grain loading of exhaust from the baghouse, A3, ~~of shall not to~~ exceed 0.01 gr/dscf. (basis: cumulative increase).
3. The baghouses, A3 and A4, shall be inspected by the owner/operator on an annual basis to ensure proper operation. Records of each annual inspection shall be kept on site for at least five years from the date of data entry and shall be made available to the District staff for inspection. (basis: Regulation 2-6-501)
4. In order to demonstrate compliance with condition #1, the owner/operator of the sources, S13, S14, and S15, shall keep dated records of material throughput in a District approved logbook. The records shall be kept for at least five years from the date of data entry, and shall be made available to the District staff for inspection. (basis: Regulation 2-6-501; cumulative increase)

Condition #17170

For S5, Mixing and Casting Operations

1. The owner/operator shall ensure the resin solution throughput shall not exceed ~~500~~750,000 gallons per consecutive 12-month period. (basis: cumulative increase)

VI. PERMIT CONDITIONS

2. The owner/operator shall maintain Styrene monomer content of the resin solution ~~shall to~~ be 43% (average) by weight and shall not exceed 46% by weight. (basis: cumulative increase)
3. The owner/operator shall use at S5 a resin solution containing ~~processed at S5 shall contain~~ vapor suppressant. (basis: Regulation 8-50-301.2)
4. The owner/operator shall maintain ~~C~~clean-up solvent (SVC-12) usage that shall not exceed 550 gallons per consecutive 12-month period. (basis: cumulative increase; Regulation 8-50-305.4)
5. The owner/operator ~~Permit Holder~~ of S5 shall keep the following records in a District approved logbook:
 - a. Maintain a list of resin, catalyst, vapor suppressant, and clean-up solvent used. (basis: Regulation 8-50-501.1)
 - b. Maintain a list of weight percent of volatile organic compound (VOC) in the resin solution, and grams of VOC per liter for the clean-up materials. (basis: Regulation 8-50-501.2)
 - c. Maintain a list of weight loss (grams per square meter) during resin polymerization, and monomer percentage. (basis: Regulation 8-50-501.3)
 - d. Maintain records on a daily basis of the resin solution, catalyst, vapor suppressant, and clean-up materials used. (basis: Regulation 8-50-501.4)

Such records shall be retained on site for a period of at least five years from the date of data entry and be made available to the District staff for inspection. (basis: Regulation 2-6-501; cumulative increase)

VII APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency column indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, using the following codes: annual (A), quarterly (Q), monthly (M), weekly (W), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

This section is only a summary of the limits and monitoring requirements. In the case of a conflict with any requirement in Sections I-VI, the preceding sections take precedence over Section VII.

**Table VII - A
 Applicable Limits and Compliance Monitoring Requirements
 S5 - MIXING AND CASTING OPERATIONS**

Type of limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Regulation 8-50-301.2	Y		weight loss/emissions from vapor suppressed resin $\leq 60 \text{ g/m}^2$ surface area	Regulation 8-50-501.3	P/E	Record keeping
	BAAQMD Regulation 8-50-304	Y		monomer content of <u>polyester resin</u> corrosion resistant materials $\leq 50\%$ by weight	Regulation 8-50-501.2	P/E	Record keeping
	BAAQMD Regulation 8-50-305.4	Y		content of cleaning material $\leq 200 \text{ g/liter}$	Regulation 8-50-501.2	P/E	Record keeping

VII APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S5 - MIXING AND CASTING OPERATIONS

Type of limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Resin solution throughput	BAAQMD Condition #17170, part 1	Y		500 750,000 gallons/yr	BAAQMD Condition #17170, part 5	P/D	Record keeping
Clean-up solvent usage	BAAQMD Condition #17170, part 4	Y		550 gallons/yr	BAAQMD Condition #17170, part 5	P/D	Record keeping

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S13, S14, S15 – AGGREGATE SILOS, #1, #2, #3

Type of limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-301	Y		Ringelmann 1.0 for $\geq \leq 3$ minutes in any hour		P/A	Annual baghouse inspection
FP	BAAQMD 6-310	Y		0.15 gr/dscf		P/A	Annual baghouse inspection
	BAAQMD Condition #16674, part 2	Y		0.01 gr/dscf	BAAQMD Condition #16674, part 3	P/A	Annual baghouse inspection
Aggregate throughput	BAAQMD Condition #16674, part 1	Y		5 75 ton/yr	BAAQMD Condition #16674, part 4	P/M	Record keeping

VIII TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 et seq. of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Table VIII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 6-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD Regulation 8-50-301.1	Process Requirements, Monomer Content	Manual of Procedures, Volume III, Method 39, Determination of Styrene Monomer Content of Polyester Resin Material
BAAQMD Regulation 8-50-301.2	Process Requirements, Vapor Suppressed Resins	Manual of Procedures, Volume III, Method 23, Determination of Volatile Emissions from Polyester Resins
BAAQMD Regulation 8-50-304	Corrosion-resistant Materials	Manual of Procedures, Volume III, Method 23, Determination of Volatile Emissions from Polyester Resins
BAAQMD Regulation 8-50-305.4	Surface Preparation and Clean- up Solvent, VOC Content	Manual of Procedures, Volume III, Method 31, Determination of Volatile Organic Compounds in Paint Strippers, Solvent Cleaners, and Low Solids Coatings
BAAQMD Regulation 8-50-307	Gel Coat Requirement	Manual of Procedures, Volume III, Method 26, Determination of Volatile Organic Weight Loss of Gel Coats
<u>40 CFR Part 63, Subpart WWW,</u>	<u>Determining Vapor Suppressant Effectiveness</u>	<u>Appendix A</u>

IX. REVISION HISTORY

Title V Permit Issuance:

June 1, 2000

Minor Revision: (application 2072)

January 28, 2002

Increase in styrene resin solution throughput at
mixing and casting operations, S5.

Increase in aggregate throughput at the aggregate
storage silos, S13, S14, and S15.

Permit to operate a new baghouse, A4.

Renewal (Application # 11267)

X. GLOSSARY

ACT

Federal Clean Air Act

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency

Excluded

Not subject to any District Regulations

X. Glossary

FP

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

HAP

Hazardous Air Pollutant Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPs

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

X. Glossary

NSR

New Source Review A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO₂

Sulfur dioxide

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit

X. Glossary

program for major and certain other facilities.

TSP

Total Suspended Particulate

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

~~**XI. APPLICABLE STATE IMPLEMENTATION PLAN**~~

~~See Attachments~~