

# Bay Area Air Quality Management District

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

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**Final**

## MAJOR FACILITY REVIEW PERMIT

**Issued To:**  
**Western Fiberglass, Inc.**  
**Facility #A7974**

**Facility Address:**  
1555 Copperhill Pkwy.  
Santa Rosa, CA 95403

**Mailing Address:**  
1555 Copperhill Pkwy.  
Santa Rosa, CA 95403

**Responsible Official:**  
Michael E. Lewis, President  
(707) 523-2050

**Facility Contact:**  
Frank Lillo  
(707) 523-2050

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**Type of Facility:** Fiberglass/Resin Operation  
**Primary SIC:** 3088  
**Product:** Fiberglass Products

**ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

Signed by Ellen Garvey  
Ellen Garvey, Air Pollution Control Officer

July 1, 1997  
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 11/3/93);
- SIP Regulation 1 - General Provisions and Definitions  
(as approved by EPA through 11/10/82);
- BAAQMD Regulation 2, Rule 1 - Permits, General Requirements  
(as amended by the District Board on 6/7/95);
- SIP Regulation 2, Rule 1 - Permits, General Requirements  
(as approved by EPA through 6/23/95);
- BAAQMD Regulation 2, Rule 2 - Permits, New Source Review  
(as amended by the District Board on 6/7/95);
- SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration  
(as approved by EPA through 10/19/84); and
- BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking  
(as amended by the District Board on 6/15/94).

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

1. This Major Facility Review Permit expires on July 1, 2002. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than January 1, 2002 and no earlier than July 1, 2001. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after June 30, 2002.** (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 reissuance, 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)
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 reissuance, or termination, or of a notification of planned changes or anticipated non-

## **I. Standard Conditions (continued)**

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, nor 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 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)

### **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**

Notwithstanding the specific wording in any requirement, all records for federally 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)

## **I. Standard Conditions (continued)**

### **F. Monitoring Reports**

All required monitoring reports must be submitted to the District at least once every six months. All instances of non-compliance shall be clearly identified in these reports. 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 to the District's Compliance and Enforcement Division within 10 days of the discovery of the incident. Within 30 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. (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 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, 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**

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 caused by conditions beyond the permit holder's reasonable control 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. Any variance granted by the Hearing Board from any term or condition of this permit

## **I. Standard Conditions (continued)**

which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)

3. Notwithstanding the foregoing, 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 unless the Major Facility Review Permit has been modified pursuant to Regulation 2, Rule 6. (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)

## II. EQUIPMENT LIST

### A. Permitted Source List

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

**Table II-A**

S-#	Description	Make or Type	Model	Capacity
S-1	Filament Winder	Durawound	Model 10-C	N/A
S-2	Closed Mold Vacuum	RTM Gun	Model 20210-00	N/A
S-3	Chopper Guns (2)	Glas-Craft	Model LPA-II-AAC	N/A

### B. Abatement Device List

**Table II-B**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Required Efficiency
A-1	Fiberglass Filters	S-2, S-3	BAAQMD Regulation 6-301		

### III. GENERAL 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

Where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit.

**Table III**

Applicable Requirement	Regulation Title or Description of Requirement	FE (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (11/3/93)	N
SIP Regulation 1	General Provisions and Definitions (11/10/82)	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
SIP Regulation 5	Open Burning (5/3/84)	Y
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	N
SIP Regulation 6	Particulate Matter and Visible Emissions (5/3/84)	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)	N
SIP Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (11/16/83)	Y

(continued)



### III. General Applicable Requirements (continued)

**Table III** (continued)

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>FE (Y/N)</b>
<b>BAAQMD Regulation 8, Rule 16</b>	<b>Organic Compounds - Solvent Cleaning Operations (6/15/94)</b>	Y
<b>BAAQMD Regulation 8, Rule 49</b>	<b>Organic Compounds - Aerosol Paint Products (12/20/95)</b>	N
<b>SIP Regulation 8, Rule 49</b>	<b>Organic Compounds - Aerosol Paint Products (3/22/95)</b>	Y
<b>BAAQMD Regulation 8, Rule 51</b>	<b>Organic Compounds - Adhesive and Sealant Products (12/20/95)</b>	N
<b>BAAQMD Regulation 11, Rule 2</b>	<b>Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)</b>	Y
<b>BAAQMD Regulation 12, Rule 4</b>	<b>Miscellaneous Standards of Performance - Sandblasting (7/11/90)</b>	N
<b>SIP Regulation 12, Rule 4</b>	<b>Miscellaneous Standards of Performance - Sandblasting (9/2/81)</b>	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 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 text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. Additionally, where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit. All other text may be found in the regulations themselves.

**Table IV-A  
 S-1 Filament Winder**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 50</b>	<b>Organic Compounds - Polyester Resin Operations (12/20/95)</b>		
8-50-110	Limited Exemption, Touch-up and Repair	Y	
8-50-301	Process Requirements	Y	
8-50-301.1	Monomer ≤ 35 wt%	Y	
8-50-301.2	Vapor Suppressant & VOC Emission ≤ 60g/m <sup>2</sup>	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	
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter	Y	
8-50-306	Equipment Requirements	Y	

(continued)

**IV. Source-Specific Applicable Requirements (continued)**

**Table IV-A (continued)  
 S-1 Filament Winder**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
8-50-307	Gel Coat Requirement	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	
<b>BAAQMD Cond. #9303</b>			
Part 1	Usage (basis: offsets, cumulative increase)	Y	
Part 2	Material Usage Specifications (basis: BACT, cumulative increase)	Y	
Part 3	Record Keeping (basis: cumulative increase, Regulation 2-6-501)	Y	
Part 3a	Daily Material Usage (basis: Regulation 8-50-501.4)	Y	
Part 3b	List of Materials and Material Properties (basis: Regulation 8-50-501.1, 501.2, 501.3)	Y	
Part 3c	Monthly Material Usage Totals (basis: offsets, cumulative increase)	Y	
Part 4	Annual Review Available Vapor Suppressants/Low Monomer Resins (basis: BACT)	Y	

#### IV. Source-Specific Applicable Requirements (continued)

**Table IV-B  
 S-2 Closed Mold Vacuum**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 50</b>	<b>Organic Compounds - Polyester Resin Operations (12/20/95)</b>		
8-50-110	Limited Exemption, Touch-up and Repair	Y	
8-50-301	Process Requirements	Y	
8-50-301.3	Closed Mold System	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	
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter	Y	
8-50-307	Gel Coat Requirement	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	
<b>BAAQMD Cond #9303</b>			
Part 5	Usage (basis: offsets, cumulative increase)	Y	
Part 6	Material Usage Specifications (basis: BACT, cumulative increase)	Y	
Part 7	Record Keeping (basis: cumulative increase, Regulation 2-6-501)	Y	
Part 7a	Daily Material Usage (basis: Regulation 8-50-501.4)	Y	
Part 7b	List of Materials and Material Properties (basis: Regulation 8-50-501.1, 501.2, 501.3)	Y	
Part 7c	Monthly Material Usage Totals (basis: offsets, cumulative increase)	Y	

#### IV. Source-Specific Applicable Requirements (continued)

**Table IV-C  
 S-3 Chopper Guns (2)**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 50</b>	<b>Organic Compounds - Polyester Resin Operations (12/20/95)</b>		
8-50-110	Limited Exemption, Touch-up and Repair	Y	
8-50-301	Process Requirements	Y	
8-50-301.1	Monomer $\leq 35$ wt%	Y	
8-50-301.2	Vapor Suppressant & VOC Emission $\leq 60\text{g/m}^2$	Y	
8-50-302	Spraying Operations	Y	
8-50-302.1	Airless Spray	Y	
8-50-302.2	Air-Assisted Airless Spray	Y	
8-50-302.3	Electrostatic Spray	Y	
8-50-302.4	HVLP	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	
8-50-305.4	Clean-up Solvent, VOC $\leq 200\text{g/liter}$	Y	
8-50-307	Gel Coat Requirement	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	
<b>BAAQMD Cond. #9303</b>			
Part 8	Usage (basis: offsets, cumulative increase)	Y	
Part 9	Material Usage Specifications (basis: BACT, cumulative)	Y	

**IV. Source-Specific Applicable Requirements (continued)**

**Table IV-C  
 S-3 Chopper Guns (2)**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
	increase)		
Part 10	Record Keeping (basis: cumulative increase, Regulation 2-6-501)	Y	

(continued)

**IV. Source-Specific Applicable Requirements (continued)**

**Table IV-C (continued)  
 S-3 Chopper Guns (2)**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
Part 10a	Daily Material Usage (basis: Regulation 8-50-501.4)	Y	
Part 10b	List of Materials and Material Properties (basis: Regulation 8-50-501.1, 501.2, 501.3)	Y	
Part 10c	Monthly Material Usage Totals (basis: offsets, cumulative increase)	Y	
Part 11	Annual Review Available Vapor Suppressants/Low Monomer Resins (basis: BACT)	Y	
Part 12	All Spray Operations Must Be In Building (basis: Regulation 6-301, 6-305)	Y	

## V. SCHEDULE OF COMPLIANCE

The permit holder shall continue to 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.

## VI. PERMIT CONDITIONS

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

### A. Source Specific Permit Conditions

#### Condition # 9303

For S-1, Filament Winder:

1. The net resin and cleanup solvent usage at S-1 shall not exceed the following limits during any consecutive 365 day period (a) 600 gallons cleaning solvent, (b) 20,000 gallons resin as applied; unless the operator can demonstrate to the satisfaction of the District, through daily recordkeeping and POC calculations, that precursor organic compound emissions from the operation of S-1 are below 7559 pounds during any consecutive 365 day period. (basis: Offsets, cumulative increase)
2. Only the following materials or their chemical equivalents shall be used at S-1.  
Cleaning Solvent: Glas-Craft TGC FRP Tool and Gun Cleaner  
Resin: Ashland Aropol L-5505T-20 Resin  
Catalyst: Methyl Ethyl Ketone Peroxide  
Before using an alternate material at S-1, the owner/operator shall first apply for and receive written approval from the District. (basis: BACT, cumulative increase)
3. To demonstrate compliance with the above conditions, the following records shall be kept on site and made available for District inspection for a period of at least 5 years from the date on which a record was made. (basis: cumulative increase, Regulation 2-6-501)
  - a) The type and quantity of cleanup solvent, resin and catalyst used daily. The type and quantities of these materials used for touch-up and repair shall be logged separately. (basis: Regulation 8-50-501.4)
  - b) Maintain a list of resins and cleanup solvents including the weight % VOC, or monomer content, of the resin and the grams of VOC per liter of cleanup solvent. (basis: Regulation 8-50-501.1, 501.2, 501.3)
  - c) Monthly totals of daily quantities. (basis: Offsets, cumulative increase)



## VI. Permit Conditions (continued)

### Condition # 9303 (continued)

For S-2, Closed Mold Vacuum:

4. Western Fiberglass shall review, on an annual basis, the commercial availability of vapor suppressants and lower monomer content resins which could be used to manufacture corrosive resistant products at S-1, and shall use these products at S-1 as soon as they are available. Western Fiberglass shall submit the results of the commercial availability review to the District, each year prior to permit renewal. (basis: BACT)
5. The net resin and cleanup solvent usage at S-2 shall not exceed the following limits during any consecutive 365 day period (a) 600 gallons cleaning solvent, (b) 30,000 gallons resin as applied; unless the operator can demonstrate to the satisfaction of the District, through daily recordkeeping and POC calculations, that precursor organic compound emissions from the operation of S-2 are below 3453 pounds during any consecutive 365 day period. (basis: Offsets, cumulative increase)
6. Only the following materials or their chemical equivalents shall be used at S-2.  
Cleaning Solvent: Glas-Craft TGC FRP Tool and Gun Cleaner  
Resin: Ashland Aropol 7241 RT  
Catalyst: Methyl Ethyl Ketone Peroxide  
Before using an alternate material at S-2, the owner/operator shall first apply for and receive written approval from the District. (basis: BACT, cumulative increase)
7. To demonstrate compliance with the above conditions, the following records shall be kept on site and made available for District inspection for a period of at least 5 years from the date on which a record was made. (basis: cumulative increase, Regulation 2-6-501)
  - a) The type and quantity of cleanup solvent, resin and catalyst used and recycled daily. The type and quantities of these materials used and recycled for touch-up and repair shall be logged separately. (basis: Regulation 8-50-501.4)
  - b) Maintain a list of resins and cleanup solvents including the weight % VOC, or monomer content, of the resin and the grams of VOC per liter of cleanup solvent. (basis: Regulation 8-50-501.1, 501.2, 501.3)
  - c) Monthly totals of daily quantities. (basis: Offsets, cumulative increase)
8. The net resin and cleanup solvent usage at S-3 shall not exceed the following limits during any consecutive 365 day period (a) 600 gallons cleaning solvent, (b) 30,000 gallons resin as applied; unless the operator can demonstrate to the satisfaction of the District, through daily recordkeeping and POC calculations, that precursor organic compound emissions from the operation of S-3 are below 15,814 pounds during any consecutive 365 day period. (basis: Offsets, cumulative increase)

## VI. Permit Conditions (continued)

### Condition # 9303 (continued)

For S-3, Chopper Guns

9. Only the following materials or their chemical equivalents shall be used at S-3.  
Cleaning Solvent: Glas-Craft TGC FRP Tool and Gun Cleaner  
Resin: Ashland Aropol L-5505T-20 Resin  
Catalyst: Methyl Ethyl Ketone Peroxide  
Before using an alternate material at S-3, the owner/operator shall first apply for and receive written approval from the District. (basis: BACT, cumulative increase)
10. To demonstrate compliance with the above conditions, the following records shall be kept on site and made available for District inspection for a period of at least 5 years from the date on which a record was made. (basis: cumulative increase, Regulation 2-6-501)
  - a) The type and quantity of cleanup solvent, resin and catalyst used daily. The type and quantities of these materials used for touch-up and repair shall be logged separately. (basis: Regulation 8-50-501.4)
  - b) Maintain a list of resins and cleanup solvents including the weight % VOC, or monomer content, of the resin and the grams of VOC per liter of cleanup solvent. (basis: Regulation 8-50-501.1, 501.2, 501.3)
  - c) Monthly totals of daily quantities. (basis: Offsets, cumulative increase)
11. Western Fiberglass shall review, on an annual basis, the commercial availability of vapor suppressants and lower monomer content resins which could be used to manufacture corrosive resistant products at S-3, and shall use these products at S-3 as soon as they are available. Western Fiberglass shall submit the results of the commercial availability review to the District, each year prior to permit renewal. (basis: BACT)
12. The spray area and all associated spray operations shall be contained within the building. (basis: Regulation 6-301, 305)

## B. Facility-wide Permit Conditions

None.

## VII. APPLICABLE EMISSION 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 indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), 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.

**Table VII-A**  
**S-1 FILAMENT WINDER**

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	Regulation 8-50-301.1	Y		monomer content $\leq$ 35% by weight	Regulation 8-50-501.2; Cond #9303, part 3b	P/E	records
	Regulation 8-50-301.2	Y		weight loss/emissions $\leq$ 60 g/m <sup>2</sup> surface area	Regulation 8-50-501.3; Cond #9303, part 3b	P/E	records
	Regulation 8-50-304	Y		monomer content $\leq$ 50% by weight	Regulation 8-50-501.2; Cond #9303, part 3b	P/E	records
	Regulation 8-50-305.4	Y		content of cleaning material $\leq$ 200 g/liter	Regulation 8-50-501.2; Cond #9303, part 3b	P/E	records
	Regulation 8-50-307	Y		content of gel coat, as applied $\leq$ 250 g/liter	Regulation 8-50-501.2; Cond #9303, part 3b	P/E	records

**VII. Applicable Emission Limits & Compliance Monitoring Requirements  
 (continued)**

**Table VII-A  
 S-1 FILAMENT WINDER**

<b>Pollutant</b>	<b>Emission Limit Citation</b>	<b>FE Y/N</b>	<b>Future Effective Date</b>	<b>Emission Limit</b>	<b>Monitoring Requirement Citation</b>	<b>Monitoring Frequency (P/C/N)</b>	<b>Monitoring Type</b>
	BAAQMD Condition #9303, Part 1	Y		7559 lbs per 365 consecutive days; or maximum cleaning solvent usage of 600 gallons and 20,000 gallons resin, as applied, per 365 day period	Regulation 8-50-501.4; Cond #9303, parts 3a and 3c	P/D	records

**VII. Applicable Emission Limits & Compliance Monitoring Requirements  
 (continued)**

**Table VII-B  
 S-2 CLOSED MOLD VACUUM**

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	Regulation 8-50-304	Y		monomer content ≤ 50% by weight	Regulation 8-50-501.2; Cond #9303, part 7b	P/E	records
	Regulation 8-50-305.4	Y		content of cleaning material ≤ 200 g/liter	Regulation 8-50-501.2; Cond #9303, part 7b	P/E	records
	Regulation 8-50-307	Y		content of gel coat, as applied ≤ 250 g/liter	Regulation 8-50-501.2; Cond #9303, part 7b	P/E	records
	BAAQMD Condition #9303, Part 5	Y		3453 lbs per 365 consecutive days; or maximum cleaning solvent usage of 600 gallons and 30,000 gallons resin, as applied, per 365 day period	Regulation 8-50-501.4; Cond #9303, parts 7a and 7c	P/D	records

## VII. Applicable Emission Limits & Compliance Monitoring Requirements (continued)

**Table VII-C  
 S-3 CHOPPER GUNS (2)**

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	Regulation 8-50-301.1	Y		monomer content ≤ 35% by weight	Regulation 8-50-501.2; Cond #9303, part 10b	P/E	records
	Regulation 8-50-301.2	Y		weight loss/emissions ≤ 60 g/m <sup>2</sup> surface area	Regulation 8-50-501.3; Cond #9303, part 10b	P/E	records
	Regulation 8-50-304	Y		monomer content ≤ 50% by weight	Regulation 8-50-501.2; Cond #9303, part 10b	P/E	records
	Regulation 8-50-305.4	Y		content of cleaning material ≤ 200 g/liter	Regulation 8-50-501.2; Cond #9303, part 10b	P/E	records
	Regulation 8-50-307	Y		content of gel coat, as applied ≤ 250 g/liter	Regulation 8-50-501.2; Cond #9303, part 10b	P/E	records
	BAAQMD Condition #9303 Part 8	Y		15814 lbs per 365 consecutive days; or maximum cleaning solvent usage of 600 gallons and 30,000 gallons resin, as applied, per 365 day period	Regulation 8-50-501.4; Cond #9303, parts 10a and 10c	P/D	records

## VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 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**

<b>Applicable Requirement</b>	<b>Description of Requirement</b>	<b>Acceptable Test Methods</b>
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 Weight Loss of Gel Coats

## **IX. GLOSSARY**

### **BAAQMD**

Bay Area Air Quality Management District

### **BACT**

Best Available Control Technology

### **Basis**

The underlying authority which allows the District to impose requirements.

### **CAA**

The federal Clean Air Act

### **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.

### **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.

### **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



## **IX. Glossary (continued)**

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.

### **NESHAPs**

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

### **NMHC**

Non-methane Hydrocarbons

### **NSR**

New Source Review. A federal program for preconstruction 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 on site contemporaneous emission reduction credits. Applies to emissions of POC, NO<sub>x</sub>, PM<sub>10</sub>, and SO<sub>2</sub>.

### **POC**

Precursor Organic Compounds

**IX. Glossary (continued)**

## **IX. Glossary (continued)**

### **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 Ambient Air Quality Standards. Mandated by Title I of the Act.

### **Title V**

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

### **VOC**

Volatile Organic Compounds

### **Units of Measure:**

g	=	grams
gal	=	gallon
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m <sup>2</sup>	=	square meter
min	=	minute
psia	=	pounds per square inch, absolute
scfm	=	standard cubic feet per minute
yr	=	year

## **X. APPENDIX A - APPLICABLE STATE IMPLEMENTATION PLAN**

See Attachments