

Bay Area Air Quality Management District

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

Final

MAJOR FACILITY REVIEW PERMIT

Issued To:
Western Fiberglass, Inc.
Facility #A7974

Facility Address:
1555 Copperhill Parkway
Santa Rosa, CA 95403

Mailing Address:
1555 Copperhill Parkway
Santa Rosa, CA 95403

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

Facility Contact:
Frank Lillo
(707) 523-2050

Type of Facility:	Fiberglass/Resin Operation	BAAQMD Permit Division
Primary SIC:	3088	M.K. Carol Lee
Product:	Fiberglass Products	Senior Air Quality Engineer

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Signed by William C. Norton
William C. Norton, Executive Officer/Air Pollution Control Officer

December 19, 2002
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 5/17/00);
- 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 5/17/00);
- 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 December 19, 2002 and expires on June 30, 2007. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than **December 31, 2006** and no earlier than **June 30, 2006**. **If a complete application for renewal has not been submitted in accordance with this deadline, the facility may not operate after June 30, 2007.** (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 or the potential to emit 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.

I. Standard Conditions

(Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

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

G. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. Monitoring reports shall be submitted for the following periods: July 1st through December 31st and January 1st through June 30th, and are due on the last day of the month after the end of the reporting period. 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 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)

H. 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 July 1st to June 30th. The certification shall be submitted by July 31st 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 shall be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX

I. Standard Conditions

75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

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

I. 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 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 LIST

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
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

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Required Efficiency
A-3	Fiberglass Filters	S-2, S-3	BAAQMD Regulation 6-301	None	None

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 will 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 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 language of SIP requirements is on EPA Region 9's website. The address is included at the end of this permit.

NOTE:

There are differences between the current BAAQMD rules and the versions of the rules 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	FE (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 2, Rule 1	General Requirements (8/1/01)	N
BAAQMD 2-1-429	Federal Emissions Statement (6/7/95)	Y
SIP Regulation 2, Rule 1	General Requirements (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
SIP Regulation 5	Open Burning (5/3/84)	Y
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	Y
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N

III. General Applicable Requirements

**Table III
 Generally Applicable Requirements**

Applicable	Regulation Title or	FE
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
BAAQMD Regulation 8, Rule 16	Organic Compounds - Solvent Cleaning Operations (6/15/94)	Y
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)	N
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y
California Health and Safety Code Section 44300 et seq.	Air Toxics "Hot Spots" Information and Assessment Act of 1987	N

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. The full language of SIP requirements is on EPA Region 9's website. The address is included at the end of this permit. All other text may be found in the regulations themselves.

Table IV – A
Source-specific Applicable Requirements
S-1 FILAMENT WINDER

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 No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-401	Appearance of Emissions	Y	
BAAQMD Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (11/06/96)		
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 ²	Y	
8-50-304	Corrosion-resistant Materials	Y	
8-50-305	Surface Preparation and Clean-up Solvent	N	
8-50-305.1	Storage in Closed Containers	Y	

IV. Source-Specific Applicable Requirements

Table IV – A
Source-specific Applicable Requirements
S-1 FILAMENT WINDER

Applicable	Regulation Title or	Federally Enforceable	Future Effective
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 N	
8-50-306	Equipment Requirements	Y	
8-50-307	Gel Coat Requirement	Y	
8-50-501	Records	N	
8-50-501.1	List of Materials Used	Y	
8-50-501.2	List VOC Content of Materials Used	N	
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	
SIP Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (12/23/97)		
8-50-305	Surface Preparation and Clean-up Solvent	Y	
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter (refers to definition in SIP 8-50 220)	<u>Y</u>	
8-50-501	Records	Y	
8-50-501.2	List VOC Content of Materials Used	Y	
40 CFR 63	National Emission Standards for Hazardous Air Pollutants for Source Categories: General Provisions; and Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Section 112(g) and 112(j); Final Rule		
63.52	Approved process for new and existing affected sources.	Y	
63.52(a)	Sources subject to section 112(j) as of the section 112(j) deadline	Y	
63.52(a)(1)	Submit an application for Title V permit revision	Y	
63.52(a)(2)	Submit an application for a Title V permit revision within 30 days after being notified by permitting authority	Y	
63.52(e)	Permit application review	Y	
63.52(e)(1)	Submit a Part 2 MACT application meeting the requirements of 63.53(b)	Y	

IV. Source-Specific Applicable Requirements

Table IV – A
Source-specific Applicable Requirements
S-1 FILAMENT WINDER

Applicable	Regulation Title or	Federally Enforceable	Future Effective
63.52(h)	Enhanced monitoring	Y	
63.52(h)(i)	MACT emission limitations	Y	
63.52(h)(i)(1)	Compliance with all requirements applicable to affected sources, including compliance date for affected sources	Y	
63.53	Application content for case-by-case MACT determination	Y	
63.53(a)	Part 1 MACT application	Y	
63.53(b)	Part 2 MACT application	Y	
BAAQMD Cond. #9303			
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: Regulations 8-50-501.1, 8-50-501.2, 8-50-501.3)	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

Table IV – B
Source-specific Applicable Requirements
S-2 CLOSED MOLD VACUUM

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 No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-401	Appearance of Emissions	Y	
BAAQMD Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (11/06/96)		
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	N	
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	N	
8-50-307	Gel Coat Requirement	Y	
8-50-501	Records	N	
8-50-501.1	List of Materials Used	Y	
8-50-501.2	List VOC Content of Materials Used	N	
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	
SIP Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (12/23/97)		
8-50-305	Surface Preparation and Clean-up Solvent	Y	
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter (refers to definition in SIP 8-50 220)	Y	

IV. Source-Specific Applicable Requirements

Table IV – B
Source-specific Applicable Requirements
S-2 CLOSED MOLD VACUUM

Applicable	Regulation Title or	Federally Enforceable	Future Effective
8-50-501	Records	Y	
8-50-501.2	List VOC Content of Materials Used	Y	
40 CFR 63	National Emission Standards for Hazardous Air Pollutants for Source Categories: General Provisions; and Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Section 112(g) and 112(j); Final Rule		
63.52	Approved process for new and existing affected sources.	Y	
63.52(a)	Sources subject to section 112(j) as of the section 112(j) deadline	Y	
63.52(a)(1)	Submit an application for Title V permit revision	Y	
63.52(a)(2)	Submit an application for a Title V permit revision within 30 days after being notified by permitting authority	Y	
63.52(e)	Permit application review	Y	
63.52(e)(1)	Submit a Part 2 MACT application meeting the requirements of 63.53(b)	Y	
63.52(h)	Enhanced monitoring	Y	
63.52(h)(i)	MACT emission limitations	Y	
63.52(h)(i)(1)	Compliance with all requirements applicable to affected sources, including compliance date for affected sources	Y	
63.53	Application content for case-by-case MACT determination	Y	
63.53(a)	Part 1 MACT application	Y	
63.53(b)	Part 2 MACT application	Y	
BAAQMD Cond. #9303			
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, 8-50-501.2, 8-50-501.3)	Y	
Part 7c	Monthly Material Usage Totals (basis: offsets, cumulative increase)	Y	

IV. Source-Specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-3 CHOPPER GUNS (2)

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 No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-401	Appearance of Emissions	Y	
BAAQMD Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (11/06/96)		
8-50-110	Limited Exemption, Touch-up and Repair	Y	
8-50-220	Volatile Organic Compound (VOC)	N	
8-50-301	Process Requirements	Y	
8-50-301.1	Monomer ≤ 35 wt%	Y	
8-50-301.2	Vapor Suppressant & VOC Emission ≤ 60g/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	N	
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	N	
8-50-307	Gel Coat Requirement	Y	
8-50-501	Records	N	
8-50-501.1	List of Materials Used	Y	
8-50-501.2	List VOC Content of Materials Used	N	
8-50-501.3	Vapor-suppressed Resin Records	Y	

IV. Source-Specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-3 CHOPPER GUNS (2)

Applicable	Regulation Title or	Federally Enforceable	Future Effective
8-50-501.4	Daily Usage Records	Y	
8-50-501.5	Record Retention for 24 months	Y	
SIP Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (12/23/97)		
8-50-305	Surface Preparation and Clean-up Solvent	Y	
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter (refers to definition in SIP 8-50 220)	<u>Y</u>	
8-50-501	Records	Y	
8-50-501.2	List VOC Content of Materials Used	Y	
40 CFR 63	National Emission Standards for Hazardous Air Pollutants for Source Categories: General Provisions; and Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Section 112(g) and 112(j); Final Rule		
63.52	Approved process for new and existing affected sources.	Y	
63.52(a)	Sources subject to section 112(j) as of the section 112(j) deadline	Y	
63.52(a)(1)	Submit an application for Title V permit revision	Y	
63.52(a)(2)	Submit an application for a Title V permit revision within 30 days after being notified by permitting authority	Y	
63.52(e)	Permit application review	Y	
63.52(e)(1)	Submit a Part 2 MACT application meeting the requirements of 63.53(b)	Y	
63.52(h)	Enhanced monitoring	Y	
63.52(h)(i)	MACT emission limitations	Y	
63.52(h)(i)(1)	Compliance with all requirements applicable to affected sources, including compliance date for affected sources	Y	
63.53	Application content for case-by-case MACT determination	Y	
63.53(a)	Part 1 MACT application	Y	
63.53(b)	Part 2 MACT application	Y	
BAAQMD Cond. #9303			
Part 8	Usage (basis: offsets, cumulative increase)	Y	

IV. Source-Specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-3 CHOPPER GUNS (2)

Applicable	Regulation Title or	Federally Enforceable	Future Effective
Part 9	Material Usage Specifications (basis: BACT, cumulative increase)	Y	
Part 10	Record Keeping (basis: cumulative increase, Regulation 2-6-501)	Y	
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 on a timely basis.

VI. PERMIT CONDITIONS

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

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: Regulations 8-50-501.1, 8-50-501.2, 8-50-501.3)
 - c) Monthly totals of daily quantities. (basis: Offsets, cumulative increase)

VI. Permit Conditions

Condition # 9303

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

Condition # 9303

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, 6-305)

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included 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.

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1 FILAMENT WINDER

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 No. 1		N	
FP	BAAQMD 6-310	Y		0.15 grains/dscf		N	
FP	BAAQMD 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	
VOC	BAAQMD 8-50-301.1	Y		monomer content \leq 35% by weight	BAAQMD 8-50-501.2; Cond #9303, part 3b	P/E	records
	BAAQMD 8-50-301.2	Y		weight loss/emissions \leq 60 g/m ² surface area	BAAQMD 8-50-501.3; Cond #9303, part 3b	P/E	records
	BAAQMD 8-50-304	Y		monomer content \leq 50% by weight	BAAQMD 8-50-501.2; Cond #9303, part 3b	P/E	records
VOC	BAAQMD 8-50-305.4	N		content of cleaning material \leq 200 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 3b	P/E	records

VII. Applicable Limits & Compliance Monitoring Requirements

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S-1 FILAMENT WINDER

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	SIP 8-50-305.4	Y		content of cleaning material ≤ 200 g/liter	SIP 8-50-501.2; Cond #9303, part 3b	P/E	records
	BAAQMD 8-50-307	Y		content of gel coat, as applied ≤ 250 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 3b	P/E	records
	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	BAAQMD 8-50-501.4; Cond #9303, parts 3a and 3c	P/D	records

Table VII-B
S-2 CLOSED MOLD VACUUM

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 No. 1		N	
FP	BAAQMD 6-310	Y		0.15 grains/dscf		N	
FP	BAAQMD 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		N	

VII. Applicable Limits & Compliance Monitoring Requirements

Table VII-B
S-2 CLOSED MOLD VACUUM

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 8-50-304	Y		monomer content ≤ 50% by weight	BAAQMD 8-50-501.2; Cond #9303, part 7b	P/E	records
	BAAQMD 8-50-305.4	Y		content of cleaning material ≤ 200 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 7b	P/E	records
	SIP 8-50-305.4	Y		content of cleaning material ≤ 200 g/liter	SIP 8-50-501.2; Cond #9303, part 7b	P/E	records
	BAAQMD 8-50-307	Y		content of gel coat, as applied ≤ 250 g/liter	BAAQMD 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	BAAQMD 8-50-501.4; Cond #9303, parts 7a and 7c	P/D	records

VII. Applicable Limits & Compliance Monitoring Requirements

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

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 No. 1		N	
FP	BAAQMD 6-310	Y		0.15 grains/dscf		N	
FP	BAAQMD 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	
VOC	BAAQMD 8-50-301.1	Y		monomer content \leq 35% by weight	BAAQMD 8-50-501.2; Cond #9303, part 10b	P/E	records
	BAAQMD 8-50-301.2	Y		weight loss/emissions \leq 60 g/m ² surface area	BAAQMD 8-50-501.3; Cond #9303, part 10b	P/E	records
	BAAQMD 8-50-304	Y		monomer content \leq 50% by weight	BAAQMD 8-50-501.2; Cond #9303, part 10b	P/E	records
	BAAQMD 8-50-305.4	Y		content of cleaning material \leq 200 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 10b	P/E	records
	SIP 8-50-305.4	Y		content of cleaning material \leq 200 g/liter	SIP 8-50-501.2; Cond #9303, part 10b	P/E	records
	BAAQMD 8-50-307	Y		content of gel coat, as applied \leq 250 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 10b	P/E	records

VII. Applicable Limits & Compliance Monitoring Requirements

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

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 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	BAAQMD 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 referenced 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 6-311	General Operations	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 8-50-305.4	Surface Preparation and Clean-up Solvent, VOC Content	Manual of Procedures, Volume III, Method 41, Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride
BAAQMD Regulation 8-50-305.4	Surface Preparation and Clean-up Solvent, VOC Content	Manual of Procedures, Volume III, Method 43, Determination of Volatile Methylsiloxanes in Solvent Based Coatings, Inks and Related Materials
SIP 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
SIP Regulation	Surface Preparation and Clean-up Solvent, VOC Content	Manual of Procedures, Volume III, Method 41, Determination of Volatile Organic Compounds in

VIII. Test Methods

Table VIII
Test Methods

Applicable		
8-50-305.4		Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride
SIP Regulation 8-50-305.4	Surface Preparation and Clean-up Solvent, VOC Content	Manual of Procedures, Volume III, Method 43, Determination of Volatile Methylsiloxanes in Solvent Based Coatings, Inks and Related Materials
BAAQMD Regulation 8-50-307	Gel Coat Requirement	Manual of Procedures, Volume III, Method 26, Determination of Volatile Weight Loss of Gel Coats

IX. PERMIT HISTORY

Initial Issuance:	July 1, 1997
Renewal:	December 19, 2002

X. GLOSSARY

ACT

Federal Clean Air Act

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

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.

Federally Enforceable, FE

IX. Glossary

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 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

FP

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

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 40 CFR Part 63.

Major Facility

A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants 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 Federal Clean Air 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 Parts 61 and 63

NMHC

Non-methane Hydrocarbons (Same as NMOC)

NMOC

Non-methane Organic Compounds (Same as NMHC)

NO_x

Oxides of nitrogen.

NSPS

IX. Glossary

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

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and 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 for the emissions from a new or modified source. 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 is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

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 those 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

IX. Glossary

THC

Total Hydrocarbons (NMHC + Methane)

Title V

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

TOC

Total Organic Compounds (NMOC + Methane, Same as THC)

TPH

Total Petroleum Hydrocarbons

TRMP

Toxic Risk Management Plan

TSP

Total Suspended Particulate

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
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

The Bay Area Air Quality Management District's portion of the State Implementation Plan can be found at EPA Region 9's website. The address is:

<http://yosemite1.epa.gov/r9/r9sips.nsf/California?ReadForm&Start=1&Count=30&Expand=3.1>