

Bay Area Air Quality Management District

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

**Permit Evaluation
and
Statement of Basis
for
MAJOR FACILITY REVIEW PERMIT
REOPENING & MINOR REVISION**

**for
Western Fiberglass, Inc
Facility # A7974**

Facility Address:
1555 Copperhill Parkway
Santa Rosa, CA 95403

Mailing Address:
1555 Copperhill Parkway
Santa Rosa, CA 95403

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Title V Statement of Basis for Reopening & Minor Revision

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the “potential to emit,” as defined by BAAQMD Regulation 2-6-218, more than 10 tons per year of styrene, which is a hazardous air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility number that consists of a letter and a 4-digit number. This facility number is also considered to be the identifier for the permit.

This facility received its initial Title V permit on July 1, 1997 and was renewed on December 19, 2002. The purpose of this action is to reopen the permit and to include a minor revision of the permit. The purpose of the reopening is to include the requirements of the Reinforced Plastics MACT. The purpose of the minor revision is to give the facility more flexibility on the use of materials. Reopening a permit requires the same process as initial issuance per BAAQMD Regulation 2-6-415. The standard sections of the permit have changed since December 19, 2002. The proposed permit shows all changes to the permit in strikeout/underline format.

B. Facility Description

Western Fiberglass, Inc. manufactures corrosive resistant tanks and other containment devices for secondary containment of hazardous materials. The tanks are made from reinforced plastic composites. Emissions of the facility are primarily volatile organic compounds (VOC). Styrene, which is both a volatile organic compound and a hazardous air pollutant, is the main pollutant.

Reinforced plastic composites consist of a mixture of fibrous reinforcement that provides strength and a plastic matrix that binds and protects the reinforcement. Composites are formed (laid up) in molds as laminates (layers of matrix and reinforcement) or cast in molds as homogeneous mixtures. Fiberglass is used as reinforcement material. Reinforcement may be

incorporated into or within products in three forms: as randomly oriented chopped fibers, woven cloth, or fiber bundles (roving). Plastic matrix is formed from the curing (chemical reaction) of the liquid resin mixture, which contains a blend of resins (unconnected plastic subunits), monomers (connecting links between the subunits), and various agents that promote curing and affect the properties of the resin mix. Fillers may also be added to a resin mix to improve the fire rating or other physical characteristics. During the curing process, the resins polymerize (connect through monomer cross-linkage) to form a tough solid plastic.

The facility uses has three permitted sources for their reinforced plastic composite operation: filament winding, forming in closed molds, and chopper gun. The chopper gun is use to form composites (lay up) in molds as laminates. Composites are also formed in the closed molds. The filament winding operation wraps a thermoset resin-impregnated glass reinforcement around a suitable mandrel (spindle or rod). The mandrel gives the shape of the final item. A filament-winding machine wraps the mandrel with resin-impregnated strands with the required amount and orientation to build the designed reinforced structure. Filament winding produces hollow items like tubes, pipes, elbows, and tanks.

C. Permit Content

The legal and factual basis for the permit follows. The permit sections are described in the order that they are presented in the permit.

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

Changes to Permit:

The dates of adoption of the rules listed in Standard Condition I.A.1 have been updated.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that have a potential to emit of more than 2 tons of a “regulated air pollutant,” as defined in BAAQMD Rule 2-6-222, per year or 400 pounds of a “hazardous air pollutant,” as defined in BAAQMD Rule 2-6-210, per year.

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device is identified by an A and a number (e.g., A24). If a source is also an abatement device, such as when an engine controls VOC emissions, it will have an “S” number. The Fiberglass Filters (A-3) was incorrectly identified A-1 in the prior Title V permit. This typo is corrected in the new permit.

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District’s regulations. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Changes to Permit:

Source and abatement device lists have not been revised since the renewal was issued on December 19, 2002.

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound), are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, be specifically described in a Title V permit if they are considered a significant source pursuant to the definition in BAAQMD Rule 2-6-239.

Changes to Permit:

The language has been amended to say that the Generally Applicable Requirements table may also contain requirements that apply to temporary sources.

The adoption dates of the rules have been updated.

New rules have been added to this section because these rules could be generally applicable or apply to unpermitted or temporary sources.

IV. Source-Specific Applicable Requirements

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) are listed following the corresponding District Rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are “federally enforceable” and a “Y” (yes) indication will appear in the “Federally Enforceable” column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the “Federally Enforceable” column will have a “Y” for “yes”. If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program.
- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District’s or EPA’s websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this permit evaluation/statement of basis.

Complex Applicability Determinations

112(j)

The 1990 Amendments to section 112 of the Clean Air Act included a new section 112(j), which is entitled “Equivalent Emission Limitation by Permit.” Section 112(j)(2) provides that the provisions of section 112(j) apply eighteen months after the EPA misses a deadline for promulgation of a standard under section 112(d) established in the source category schedule for standards. The EPA missed the deadline for Reinforced Plastic Composites Production, to which this facility was subject on November 15, 2000.

On May 20, 1994, EPA issued a final rule (40 CFR 63, Subpart B) for implementing section 112(j). That rule requires major source owners or operators to submit a permit application 18 months after a missed date on a regulatory schedule. 40 CFR 63, Subpart B also establishes requirements for the content of the permit applications and contains provisions governing the establishment of the maximum achievable control technology (MACT) equivalent emission limitations by the permitting authority.

40 CFR 63, Subpart B was amended on April 5, 2002. It required the applications in two parts. The Part 1 applications were due on May 15, 2002. Western Fiberglass submitted the application on May 14, 2002. The amended regulations allow the facility to request an applicability determination. Any Part 2 application is due two years from the date of the applicability determination. The determination was made on September 19, 2002, therefore the Part 2 application is due September 19, 2004. However, prior to this deadline 40 CFR Part 63, WWW – NESHAPs: Reinforced Plastic Composites Production was promulgated. The facility is no longer subject to Subpart B..

Applicability of 40 CFR Part 63, WWW - NESHAPS

The facility is subject to the requirements of 40 CFR Part 63, WWW – NESHAPs: Reinforced Plastic Composites Production. This rule became effective on April 23, 2003. This rule regulates production and ancillary processes used to manufacture products with thermoset resins and gel coats. Reinforced plastic composites production facilities emit hazardous air pollutants, such as styrene, etc., which has adverse health effects. The NESHAP will also implement section 112(d) of the Clean Air Act (CAA) by requiring all major sources in this category to meet HAP emission standards.

As a result of the adoption of the NESHAP for Reinforced Plastic Composites Productions, this Title V permit is being reopened to include their applicable requirements to the facility. All prior sections of 112(j) standards are to be removed.

The facility submitted an application for a Change of Conditions to allow operating flexibility in the use of acetone as a cleaning material. BACT was triggered and found not to be cost-effective. The requested Change of Conditions did not trigger PSD or NESHAPS requirements. The final evaluation report is provided in the appendix of this Statement of Basis. Because the limits for acetone and NPOCs are not federally enforceable the numbering scheme of the conditions will be modified to identify the non-federally enforceable limit. A new limit will be added for the use of ODC to ensure that NESHAP requirements are not triggered.

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

“409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

Changes to Permit:

There is no change in this section for this reopening of the Title V permit.

VI. Permit Conditions

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and as appropriate, revised the conditions for clarity and enforceability. Each permit condition is identified with a unique numerical identifier, up to five digits.

Where necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting has been added to the permit.

All changes to existing permit conditions are clearly shown in “strike-out/underline” format in the proposed permit. When the permit is issued, all ‘strike-out’ language will be deleted; all “underline” language will be retained.

The existing permit conditions are generally derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). It is also possible for permit conditions to be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 *et seq.*, an order of abatement pursuant to H&SC § 42450 *et seq.*, or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

The regulatory basis has been referenced following each condition. The regulatory basis may be a rule or regulation. The District is also using the following codes for regulatory basis:

- BACT: This code is used for a condition imposed by the APCO to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- Cumulative Increase: This code is used for a condition imposed by the APCO which limits a source’s operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- Offsets: This code is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- PSD: This code is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit pursuant to Regulation 2, Rule 2.
- TRMP: This code is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District’s Toxic Risk Management Policy.

On September 2, 2003, Western Fiberglass submitted that a change of condition application (Application # 8164) to amend Condition ID # 9303 to allow the use of alternative material and to incorporate flexibility into their operating conditions to allow the change to different material

in the future as long as there is no increase in emissions above their identified emission limit or above any risk screening trigger level for toxics other than styrene which is limited to the monomer content of 50% per Regulation 8-50-304. Previously, the permit conditions limited the facility to a specific brand of material and requiring District pre-approval before use of new material is allowed. The Change of Condition was approved on November 6, 2003. As a result, the conditions in Section VI have been amended to reflect these approved changes and the changes in this section qualify as a minor revision of the Title V permit. The evaluation for Application # 8164 is included in the appendix.

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

A discussion of the requirements is contained in the permit evaluation/statement of basis for the renewal of this permit in 2002.

Changes to Permit:

Since the last issuance of the Title V permit for this facility, 40 CFR 63 Subpart WWWW has been finalized and promulgated effective April 21, 2003. The Subpart is incorporated in the Title V permit. It is presumed that the monitoring imposed by recent NESHAPS is sufficient.

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section VI of the permit.

Changes to Permit:

There is no change in this section for this Title V reopening.

IX. Permit Shield:

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit that identifies and justifies specific federally enforceable regulations and standards which the APCO has confirmed are not applicable to a source or group of sources, or (2) A provision in a major facility review permit that identifies and justifies specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting which are subsumed because other applicable requirements for

monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

This facility has no permit shields.

Changes to Permit:

There is no change in this section for this Title V reopening.

D. Alternate Operating Scenarios:

No alternate operating scenario has been requested for this facility.

There is no change in this section for this Title V reopening.

E. Compliance Status:

There is no change in compliance status for this facility.

F. Differences between the Application and the Proposed Permit:

Source and abatement device lists have not been revised since the renewal was issued.

Permit Evaluation and Statement of Basis for Reopening and Minor Revision:
A7974, Western Fiberglass, 1555 Copperhill Parkway, Santa Rosa, CA 95403

APPENDIX A
GLOSSARY

ACT

Federal Clean Air Act

APCO

Air Pollution Control Officer: Head of Bay Area Air Quality Management District

ARB

Air Resources Board

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

CAPCOA

California Air Pollution Control Officers Association

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

dscf

Dry Standard Cubic Feet

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 (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. See 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

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 for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. 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, NOx, 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

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
MMbtu	=	million btu
MMcf	=	million cubic feet
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

Permit Evaluation and Statement of Basis for Reopening and Minor Revision:
A7974, Western Fiberglass, 1555 Copperhill Parkway, Santa Rosa, CA 95403

APPENDIX B
EVALUATION REPORT for
APPLICATION # 8165

**ENGINEERING EVALUATION REPORT
WESTERN FIBERGLASS, INC.; SITE NUMBER A7974
APPLICATION NUMBER 08164**

I. BACKGROUND

Western Fiberglass, Inc. has requested a Change of Condition to Condition ID # 9303 to allow the use of alternative material and to incorporate flexibility into their operating conditions to allow the change to different material in the future as long as there is no increase in emissions above their identified emission limit or above any risk screening trigger level for toxics other than styrene which is limited to the monomer content of 50% per Regulation 8-50-304. Currently, the permit conditions are limiting the facility to a specific brand of material and requiring District pre-approval before use of new material is allowed. Western Fiberglass has applied for a Change of Permit Conditions for the following sources to allow usage of alternative resin, gelcoat and cleanup solvent (i.e., acetone) for:

- 1 Filament Winding
 - 2 Closed Mold Vacuum
- 3 Chopper Gun (2) 1 Backup included

II. EMISSION CALCULATIONS

There is no increase of POC emissions proposed by the facility. They have requested a change of conditions to allow them to use alternative materials from what is specified in their permit conditions while retaining the same usage and POC emissions limit. However, because they want to use acetone as a cleanup solvent, there is an increase in Non-Precursor Organic Compound (NPOC) emissions due to its usage because the previous solvent was a Precursor Organic Compound (POC):

$$\text{NPOC} = 600 \text{ gals/yr}(6.6 \text{ lb/gal})^3 = 11,880.00 \text{ lbs/yr} = 5.94 \text{ TPY}$$

III. STATEMENT OF COMPLIANCE

A. Toxic Risk Assessment

Based on the proposed new materials that will be used at this facility, there is no increase in toxic emissions estimated. Hence, a risk screening is not required.

B. New Source Review - Regulation 2, Rule 2

1. Best Available Control Technology Requirements (2-2-301)

A Best Available Control Technology (BACT) review is required for any modified source which results in an increase in emissions from a modified source and which has the potential to emit 10.0 pounds or more per highest day of POC, NPOC, NO_x, SO₂, PM₁₀, or CO. BACT shall be applied for any of the above pollutants which meets both criteria.

There will be an increase of NPOC emissions due to the use of acetone, which exceeds 10 pounds per day. As a result, BACT is triggered. If the room which houses the three sources is abated, it would require most likely require a carbon concentrator and thermal oxidizer to abate the large airflow generated by ventilated the large room that the three sources is in. According to the EPA's Con-Co\$t spreadsheet for a 20,000 cfm carbon concentrator and 2,000 cfm thermal oxidizer, the annualized cost for the carbon concentrator is \$69,065 and the thermal oxidizer is \$61,870 per year (not including ducting cost). To abate 5.94 tons per year of NPOC would require a cost of \$22,042 per ton of organics reduced, which is greater than the cost-effectiveness trigger of \$17,500 per ton. As a result, it is not cost-effective to abate. BACT is used of the lowest-vapor pressure solvent available.

2. Offset Requirements (2-2-302)

Because only NPOC emissions will result from this Change of Condition application, offsets are not triggered.

3. School Notification (2-1-412)

This facility is over 1000 feet from the nearest school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

4. CEQA Compliance

This permit application is not subject to CEQA because the evaluation is a ministerial action conducted using the fixed standards and objective measurements outlined in this Permit Handbook chapter (11.12). Therefore, the applicant does not need to submit any CEQA-related information to deem the application complete. This permit application is exempt from CEQA because the permit evaluation is a ministerial action.

IV. PERMIT CONDITIONS

I recommend the following changes to Condition # 9303: [underlines indicate additions, while strikethroughs indicate deletions]

COND# 9303 -----

Conditions for S-1, Application 93888164, Plant 7974

~~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.~~

1. The owner/operator of S-1 shall not exceed the following usage limits in any consecutive 12-month period:
Acetone 600 Gallons
Polyester Resin/Gelcoat 20,000 Gallons
(basis: 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.~~

2. The owner/operator may use solvents and materials other than the materials specified in Condition 1, and/or uses in excess of those specified in Condition 1, provided that the owner/operator can demonstrate that the following are satisfied:
a. Total POC emissions from S-1 do not exceed 7,559 pounds in any consecutive twelve month period.

b. Total NPOC emissions from S-1 do not exceed 3,960 pounds in any consecutive twelve month period.

c. The use of these materials does not increase toxics emissions above any risk screening trigger level, except for styrene which shall not exceed the monomer content limit of Regulation 8-50-304.

(basis: 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 24 months from the date on which a record was made.~~

~~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.~~

~~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.~~

~~c) monthly totals of daily quantities~~

3. The owner/operator shall keep monthly records of the following in a District-approved log for at least two years and shall make such records available to the District upon request:

a. Maintain a list of resin, catalyst, and cleaning material used.

c. Maintain a list of the weight of VOC (in percent) in the polyester resin materials and the grams of VOC per liter for the cleaning materials.

c. Maintain records on a daily basis that provides the following information as applicable:

a. the amount of each of the polyester resin materials and cleaning materials used.

b. the volume of resin and cleaning materials used for touch-up and repair.

f. Such records shall be retained and available for inspection by the APCO for the previous 24-month period.

(basis: Cumulative Increase; Regulation 8-50-501)

~~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.~~

4. The owner/operator shall comply with the applicable requirements of Regulation 8-50. (basis: Regulation 8-50)

Conditions for S-2, Application 9388164, Plant 7974

~~1. 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.~~

1. The owner/operator of S-2 shall not exceed the following usage limits in any consecutive 12-month period:

<u>Acetone</u>	<u>600 Gallons</u>
<u>Polyester Resin/Gelcoat</u>	<u>30,000 Gallons</u>

(basis: Cumulative Increase)

~~2. 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.~~

2. The owner/operator may use solvents and materials other than the materials specified in Condition 1, and/or uses in excess of those specified in Condition 1, provided that the owner/operator can demonstrate that the following are satisfied:
 - a. Total POC emissions from S-1 do not exceed 3,453 pounds in any consecutive twelve month period.
 - b. Total NPOC emissions from S-1 do not exceed 3,960 pounds in any consecutive twelve month period.
 - c. The use of these materials does not increase toxics emissions above any risk screening trigger level, except for styrene which shall not exceed the monomer content limit of Regulation 8-50-304. (basis: 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 24 months from the date on which a record was made.~~

- 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.~~
- 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.~~
- c) ~~monthly totals of daily quantities~~

3. The owner/operator shall keep monthly records of the following in a District-approved log for at least two years and shall make such records available to the District upon request:
 - a. Maintain a list of resin, catalyst, and cleaning material used.

- b. Maintain a list of the weight of VOC (in percent) in the polyester resin materials and the grams of VOC per liter for the cleaning materials.
- c. Maintain records on a daily basis that provides the following information as applicable:
 - 1. the amount of each of the polyester resin materials and cleaning materials used.
 - 2. the volume of resin and cleaning materials used for touch-up and repair.
- c. Such records shall be retained and available for inspection by the APCO for the previous 24-month period.
(basis: Cumulative Increase; Regulation 8-50-501)
- 4. The owner/operator shall comply with the applicable requirements of Regulation 8-50. (basis: Regulation 8-50)

Conditions for S-3, Application ~~9388~~164, Plant 7974

- ~~1. 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.~~
- 1. The owner/operator of S-3 shall not exceed the following usage limits in any consecutive 12-month period:

<u>Acetone</u>	<u>600 Gallons</u>
<u>Polyester Resin/Gelcoat</u>	<u>30,000 Gallons</u>

(basis: Cumulative Increase)
- ~~2. 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.~~
- 2. The owner/operator may use solvents and materials other than the materials specified in Condition 1, and/or uses in excess of those specified in Condition 1, provided that the owner/operator can demonstrate that the following are satisfied:
 - a. Total POC emissions from S-1 do not exceed 15,814 pounds in any consecutive twelve month period.
 - b. Total NPOC emissions from S-1 do not exceed 3,960 pounds in any consecutive twelve month period.
 - c. The use of these materials does not increase toxics emissions above any risk screening trigger level, except for styrene which shall not exceed the monomer content limit of Regulation 8-50-304. (basis: 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 24 months from the date on which a record was made.~~
- ~~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.~~
- ~~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.~~
- ~~c) monthly totals of daily quantities~~

3. The owner/operator shall keep monthly records of the following in a District-approved log for at least two years and shall make such records available to the District upon request:
- a. Maintain a list of resin, catalyst, and cleaning material used.
- d. Maintain a list of the weight of VOC (in percent) in the polyester resin materials and the grams of VOC per liter for the cleaning materials.
- c. Maintain records on a daily basis that provides the following information as applicable:
1. the amount of each of the polyester resin materials and cleaning materials used.
2. the volume of resin and cleaning materials used for touch-up and repair.
- e. Such records shall be retained and available for inspection by the APCO for the previous 24-month period.
(basis: Cumulative Increase; Regulation 8-50-501)

- ~~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 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.~~

4. The owner/operator shall comply with the applicable requirements of Regulation 8-50. (basis: Regulation 8-50)

5. The owner/operator shall ensure that tThe spray area and all associated spray operations shall be contained within the building.

6. In no case, shall the owner/operator operate more than one chopper gun operate at any time.

Permit Evaluation and Statement of Basis for Reopening and Minor Revision:
A7974, Western Fiberglass, 1555 Copperhill Parkway, Santa Rosa, CA 95403

V. RECOMMENDATION

It is recommended that a Change of Permit Conditions be issued to Western Fiberglass, Inc. for the following:

- 1 Filament Winding
- 2 Closed Mold Vacuum
- 3 Chopper Gun (2) 1 Backup included

as indicated in section IV.

By: _____ Date: _____
M.K. Carol Lee
Senior Air Quality Engineer