Bay Area Air Quality Management District

375 Beale St, Suite 600
San Francisco, CA 94105
(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:	**Facility Contact:**
Frank Lillo	Courtney Van Amstel
President	Director of Compliance
(707) 523-2050	(707) 523-2050

Type of Facility:	Fiberglass/Resin Operation	BAAQMD Engineering Division Contact:
Primary SIC:	3088	Youjin Kim
Product:	Fiberglass Products	Air Quality Engineer

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Philip M. Fine, Ph.D.
Executive Officer/Air Pollution Control Officer

December 10, 2024
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 5/4/11);
SIP Regulation 1 - General Provisions and Definitions
(as approved by EPA on 6/28/99);
BAAQMD Regulation 2, Rule 1 - Permits, General Requirements
(as amended by the District Board on 12/15/21, effective 7/1/22);
SIP Regulation 2, Rule 1 - Permits, General Requirements
(as approved by EPA on 5/21/18);
BAAQMD Regulation 2, Rule 2 - Permits, New Source Review
(as amended by the District Board on 12/6/17; approved by EPA on 5/21/18);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking
(as amended by the District Board on 12/6/17; approved by EPA on 5/21/18);
BAAQMD Regulation 2, Rule 5 – New Source Review of Toxic Air Contaminants
(as amended by the District Board on 12/15/21, effective 7/1/22);
BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review
(as amended by the District Board on 12/6/17); and
SIP Regulation 2, Rule 6 – Permits, Major Facility Review
(as approved by EPA on 6/23/95)

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

1. This Major Facility Review Permit was issued on December 10, 2024 and expires on December 9, 2029. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than June 9, 2028 and no earlier than December 9, 2028. **If a complete application for renewal has not been submitted in accordance with this deadline, the facility may not operate after December 9, 2029.** If the permit renewal has not been issued by December 9, 2029 but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application. (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

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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 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 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. (Regulation 2-6-409.20, MOP Volume II, Part 3, §4.11)
12. The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless whether it acts through employees, agents, contractors, or subcontractors. (Regulation 2-6-307)

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C. Requirement to Pay Fees

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

D. Inspection and Entry

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

E. Records

1. The permit holder must provide any information, records, and reports requested or specified by the APCO. (Regulation 1-441, Regulation 2-6-409.4)
2. Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of creation of the record. (Regulation 2-6-501, MOP Volume II, Part 3, §4.7)

F. 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 by e-mail to compliance@baaqmd.gov or by postal mail to the following address:

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale St, Suite 600
San Francisco, CA 94105
Attn: Title V Reports

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

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be 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 certification should be directed to the District's

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Compliance and Enforcement Division at the address above, and a copy of the certification shall be sent by e-mail to r9.aeo@epa.gov or postal mail to the Environmental Protection Agency at the following address:

Director
Enforcement Division, TRI & Air Section (ENF-2-1)
USEPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

(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 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-3	Chopper Guns (2)	Glass-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-3	BAAQMD Regulations 6-1-301, 6-1-310.1, and 6-1-311.1 SIP Regulations 6-301, 6-310 and 6-311	None	None

Table II C -- Sources Exempt From Permitting

The following source has been determined to be exempt from the requirements of BAAQMD Regulation 2, Permits and have applicable requirement(s) listed in Section IV.

S-#	Description	Make or Type	Model	Capacity	Comment (Exemption Citation)
4	Hand Grinders	Make: Hilti	AG450-7	N/A	Regulation 2-1-121.1

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements 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. This section also contains provisions that may apply to temporary sources.

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

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

The full language of the SIP requirements are available on the EPA Region 9 website. The address is:
http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions.

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 (5/4/11)	N
SIP Regulation 1	General Provisions and Definitions (6/28/99)	Y
BAAQMD Regulation 2, Rule 1	General Requirements (12/15/21, effective 7/1/22)	N
SIP Regulation 2, Rule 1	General Requirements (5/21/18)	Y
BAAQMD 2-1-429	Federal Emissions Statement (12/21/04)	Y
BAAQMD Regulation 2, Rule 2	New Source Review (12/5/17; As approved by EPA on 5/21/18)	Y
BAAQMD Regulation 2, Rule 4	Permits, Emissions Banking (12/6/17; As approved by EPA on 5/21/2018)	Y

III. Generally Applicable Requirements

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	FE (Y/N)
BAAQMD Regulation 2, Rule 5	New Source Review of Toxic Air Contaminants (12/15/21, effective 7/1/22)	N
BAAQMD Regulation 2, Rule 6	Permits, Major Facility Review (12/6/21)	N
SIP Regulation 2, Rule 6	Permits, Major Facility Review (6/23/95)	Y
BAAQMD Regulation 3	Fees (6/5/24, effective 7/1/24)	N
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 (11/20/19)	N
SIP Regulation 5	Open Burning (9/4/98)	Y
BAAQMD Regulation 6	Particulate Matter – Common Definitions and Test Methods (8/1/18)	N
BAAQMD Regulation 6, Rule 1	Particulate Matter, General Requirements (7/31/18)	N
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)	Y
BAAQMD Regulation 6, Rule 6	Prohibition of Trackout (8/1/18)	N
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (11/3/21)	N
SIP Regulation 8, Rule 1	Organic Compounds – General Provisions (3/22/95)	Y
BAAQMD Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (5/4/22)	N
SIP Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (3/22/95)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (7/1/09)	N
SIP Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (1/2/04)	Y
BAAQMD Regulation 8, Rule 4	Organic Compounds – General Solvent and Surface Coating Operation (10/16/02)	Y
BAAQMD Regulation 8, Rule 15	Organic Compounds – Emulsified and Liquid Asphalts (6/1/94)	Y
BAAQMD Regulation 8, Rule 40	Organic Compounds – Aeration of Contaminated Soil and Removal of Underground Storage Tanks (6/15/05)	N
SIP Regulation 8, Rule 40	Organic Compounds - Aeration of Contaminated Soil and Removal of Underground Storage Tanks (4/19/01)	Y
BAAQMD Regulation 8, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction Operations (6/15/05)	N
SIP Regulation 8, Rule 47	Organic Compounds - Air Stripping and Soil Vapor Extraction Operations (4/26/95)	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 (7/17/02)	N

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Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	FE (Y/N)
SIP Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (2/26/02)	Y
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (11/3/21)	N
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (6/8/99)	Y
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (10/7/98)	N
BAAQMD Regulation 11, Rule 18	Reduction of Risk from Air Toxic Emissions at Existing Facilities (11/15/17)	N
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
BAAQMD Regulation 14, Rule 1	Mobile Source Emissions Reduction Measures - Bay Area Commuter Benefits Program	N
California Health and Safety Code Section 41750 et seq.	Portable Equipment	N
California Health and Safety Code Section 44300 et seq.	Air Toxics “Hot Spots” Information and Assessment Act of 1987	N
California Health and Safety Code Title 17, Section 93115	Airborne Toxic Control Measure for Stationary Compression Ignition Engines	N
California Health and Safety Code Title 17, Section 93116	Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater	N
40 CFR Part 61, Subpart M	National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos (7/20/04)	Y
40 CFR 82 Subpart F	Protection of Stratospheric Ozone (06/13/2024)	Y
Subpart F, 40 CFR 82.156	Recycling and Emissions Reductions – Required Practices	Y
Subpart F, 40 CFR 82.161	Recycling and Emissions Reductions – Technician Certification	Y
Subpart F, 40 CFR 82.166	Recycling and Emissions Reductions – Reporting and Recordkeeping Requirements	Y

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

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

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

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

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of the SIP requirements are available on the EPA Region 9 website. The address is:

http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions. 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, Rule 1	**Particulate Matter, General Requirements (8/1/18)**		
6-1-301	Ringelmann No. 1 Limitation	N	
6-1-305	Visible Particles	N	
6-1-311	Total Suspended Particulate (TSP) Weight Limits	N	
6-1-311.1	TSP ≤ Process Weight Rate in Table 6-1-311.1	N	
6-1-401	Appearance of Emissions	N	
SIP Regulation 6	**Particulate Matter and Visible Emissions (9/4/98)**	Y	
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	

IV. Source-Specific Applicable Requirements

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
6-311	General Operations	Y	
6-401	Appearance of Emissions	Y	
BAAQMD Regulation 8, Rule 50	**Organic Compounds - Polyester Resin Operations (12/2/09)**		
8-50-249	Volatile Organic Compound	N	
8-50-301	Process Requirements	N	
8-50-301.4	Closed-Mold System	N	
8-50-301.5	Vapor Suppressant & VOC Emission ≤ 50 g/m^2	N	
8-50-301.6	Monomer Limits	N	
	Pigmented Gel Coats	N	
	White and Off-White Gel Coats ≤ 30%	N	
	Primer Gel Coats ≤ 28%	N	
	Resins	N	
	Lamination Resins ≤ 31% for fillers or 35% without fillers	N	
8-50-304	Corrosion-resistant Materials	N	
8-50-305	Surface Preparation and Clean-up Solvent	N	
8-50-305.1	Storage in Closed Containers	N	
8-50-305.2	Self-closing Containers, Disposal	N	
8-50-305.3	Minimizing Organic Emissions from Spray Equipment Clean-up	N	
8-50-305.4	Clean-up Solvent, VOC 25 g/liter	N	
8-50-305.5	Cold Cleaner Compliance	N	
8-50-306	Equipment Requirements	N	
8-50-307	Gel Coat Requirement	N	
8-50-501	Records	N	
8-50-501.1	List of Materials Used	N	
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 36 months	N	

IV. Source-Specific Applicable Requirements

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
SIP Regulation 8, Rule 50	**Organic Compounds Polyester Resin Operations (12/23/97)**		
8-50-220	Volatile Organic Compound	Y	
8-50-301	Process Requirements	Y	
8-50-301.2	Vapor Suppressant & VOC Emission ≤ 60g/m2	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 ≤ 200 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	
NESHAP Part 63 Subpart A	**National Emission Standards for Hazardous Air Pollutants for Source Categories, General Provisions (03/11/2021)**		
63.4	Prohibited Activities and Circumvention	Y	
63.6(e)	Operation and Maintenance	Y	
63.7	Performance Testing Requirements	Y	
63.8	Monitoring Requirements	Y	
63.9	Notification Requirements	Y	
63.10	Recordkeeping and Reporting Requirements	Y	
63.10(a)	Applicability of recordkeeping and reporting	Y	
63.10(b)(1)	Records Retention	Y	

IV. Source-Specific Applicable Requirements

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
40 CFR 63 Subpart WWWW	**National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (11/19/2020)**	Y	
63.5805	What standards must I meet to comply with this subpart?	Y	
63.5805(b)	Existing facility that is not a small business and that emits less than 100 TPY of HAP – Table 3.	Y	
63.5810	What are my options for meeting the standards for new and existing open molding and centrifugal casting operations?	Y	
63.5810(d)	Resins and gel coats HAP content – Table 7	Y	
63.5835	What are my general requirements for complying with this subpart?	Y	
63.5835(a)	Work practice standards in Table 4, as well as emission limits of Table 3 or 5 or the organic HAP content limits in Table 7 (without the use of add-on control equipment)	Y	
63.5835(c)	Operate and maintain affected source according to provisions of 63.6(e)(1)(i)	Y	
63.5840	By what date must I conduct a performance test or other initial compliance demonstration?	Y	
63.5860	How do I demonstrate initial compliance with the standards?	Y	
63.5860(a)	Table 8 and 9	Y	
63.5895	How do I monitor and collect data to demonstrate continuous compliance?	Y	
63.5895(b)	Monitor and collect data	Y	
63.5895 (c)	Collect and keep records of resin and gel coat use, organic HAP content, etc.	Y	
63.5895(d)	Initial demonstration of organic HAP emission limit or content limit	Y	
63.5900	How do I demonstrate continuous compliance with the standards?	Y	
63.5900(a)	Demonstrating compliance	Y	
63.5900(a)(2)	Compliance with emission limits using point value system	Y	
63.5900(a)(3)	Compliance with content limits using average value method or individual value method.	Y	
63.5900(a)(4)	Compliance with work practice requirements – Table 4	Y	

IV. Source-Specific Applicable Requirements

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
63.5900(b)	Reporting deviations from standards	Y	
63.5900(c)	Compliance with the applicable organic HAP emissions limits and work practice standards at all times	Y	
63.5905	What notifications must I submit and when?	Y	
63.5910	What reports must I submit and when?	Y	
63.5912	How do I submit my reports?	Y	
63.5915(a), (c)(d)	What records must I keep?	Y	
63.5920	In what form and how long must I keep my records?	Y	
63.5925	What parts of the General Provisions apply to me?	Y	
Table 3, Part 1b	Open molding - corrosion resistant and/or high strength, filament application	Y	
Table 3, Part 2b	Open molding - non-corrosion resistant and/or high strength, filament application	Y	
Table 3, Part 4b	Open molding - low flame spread/low-smoke products, filament application	Y	
Table 3, Part 5b	Open molding – shrinkage-controlled resin, filament application	Y	
Table 3, Part 6a	Tooling gel coating	Y	
Table 3, Part 6b	White/off-white pigmented gel coating	Y	
Table 3, Part 6c	All other pigmented gel coating	Y	
Table 3, Part 6d	Corrosion resistant and/or high strength gel coating	Y	
Table 3, Part 6e	Fire retardant gel coat	Y	
Table 3, Part 6f	Clear production gel coat	Y	
BAAQMD Condition #9303			

IV. Source-Specific Applicable Requirements

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
Part 1a	Acetone Usage (basis: cumulative increase)	N	
Part 1b	Polyester Resin/Gelcoat Usage (basis: cumulative increase)	Y	
Part 2a	POC Emission Limit for S-1 (basis: BACT, cumulative increase)	Y	
Part 2b	NPOC Emission Limit for S-1 (basis: BACT, cumulative increase)	N	
Part 3	Record Keeping (basis: cumulative increase, Regulation 8-50-501)	Y	
Part 4	Compliance with Regulation 8-50 (basis: BACT; Regulation 8-50)	Y	

IV. Source-Specific Applicable Requirements

Table IV – B
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, Rule 1	**Particulate Matter, General Requirements (8/1/18)**		
6-1-301	Ringelmann No. 1 Limitation	N	
6-1-305	Visible Particles	N	
6-1-310	Total Suspended Particulate Concentration Limits	N	
6-1-311	Total Suspended Particulate (TSP) Weight Limits	N	
6-1-311.1	TSP ≤ Process Weight Rate in Table 6-1-311.1	N	
6-1-401	Appearance of Emissions	N	
SIP Regulation 6	**Particulate Matter and Visible Emissions (9/4/98)**		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
6-401	Appearance of Emissions	Y	
BAAQMD Regulation 8, Rule 50	**Organic Compounds - Polyester Resin Operations (12/2/09)**		
8-50-220	Hopper Spray Gun	N	
8-50-301	Process Requirements	N	
8-50-301.5	Vapor Suppressant ≤ 50 g/m^2	N	
8-50-301.6	Monomer Content Limits	N	
	Pigmented Gel Coats	N	
	White and Off-White Gel Coats ≤ 30%	N	
	Primer Gel Coats ≤ 28%	N	
	Resins	N	
	Lamination Resins ≤ 31% for fillers or 35% without fillers	N	
8-50-302	Spraying Operations	N	
8-50-302.1.1	Atomized Spray Techniques	N	

IV. Source-Specific Applicable Requirements

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-50-302.2	Approved Resin Application Techniques	N	
8-50-302.3	Resin Use	N	
8-50-304	Corrosion-resistant Materials	N	
8-50-305	Surface Preparation and Clean-up Solvent	N	
8-50-305.1	Storage in Closed Containers	N	
8-50-305.2	Self-closing Containers, Disposal	N	
8-50-305.3	Minimizing Organic Emissions from Spray Equipment Clean-up	N	
8-50-305.4	Clean-up Solvent, VOC ≤ 25g/liter	N	
8-50-307	Gel Coat Requirement	N	
8-50-501	Records	N	
8-50-501.1	List of Materials Used	N	
8-50-501.2	List VOC Content of Materials Used	N	
8-50-501.3	Vapor-suppressed Resin Records	N	
8-50-501.4	Daily Usage Records	N	
8-50-501.5	Record Retention for 36 months	N	
SIP Regulation 8, Rule 50	**Organic Compounds - Polyester Resin Operations (12/23/97)**		
8-50-110	Limited Exemption, Touch-up and Repair	Y	
8-50-220	Volatile Organic Compound	Y	
8-50-301	Process Requirements	Y	
8-50-301.1	Monomer Content ≤ 35% wt.	Y	
8-50-301.2	Vapor Suppressant & VOC Emission ≤ 60g/m2	Y	
8-50-302	Process Requirements	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	High-volume, Low-pressure Spray	Y	
8-50-304	Corrosion-resistant Materials	Y	

IV. Source-Specific Applicable Requirements

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
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	
NESHAP Part 63 Subpart A	**National Emission Standards for Hazardous Air Pollutants for Source Categories, General Provisions (03/11/2021)**		
63.4	Prohibited Activities and Circumvention	Y	
63.6(e)	Operation and Maintenance	Y	
63.7	Performance Testing Requirements	Y	
63.8	Monitoring Requirements	Y	
63.9	Notification Requirements	Y	
63.10	Recordkeeping and Reporting Requirements	Y	
63.10(a)	Applicability of recordkeeping and reporting	Y	
63.10(b)(1)	Records Retention	Y	
40 CFR 63 Subpart WWWW	National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production **(11/19/2020)**	Y	
63.5805	What standards must I meet to comply with this subpart?	Y	
63.5805(b)	Existing facility that is not a small business and that emits less than 100 TPY of HAP – Table 3 & Table 4.	Y	
63.5810	What are my options for meeting the standards for new and existing open molding and centrifugal casting operations?	Y	
63.5810(d)	Resins and gel coats HAP content – Table 3	Y	
63.5835	What are my general requirements for complying with this subpart?	Y	

IV. Source-Specific Applicable Requirements

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.5835(a)	Work practice standards in Table 4, as well as emission limits of Table 3 or 5 (without the use of add-on control equipment)	Y	
63.5835(c)	Operate and maintain affected source according to provisions of 63.6(e)(1)(i)	Y	
63.5840	By what date must I conduct a performance test or other initial compliance demonstration?	Y	
63.5860	How do I demonstrate initial compliance with the standards?	Y	
63.5860(a)	Table 8 and 9	Y	
63.5895	How do I monitor and collect data to demonstrate continuous compliance?	Y	
63.5895(b)	Monitor and collect data	Y	
63.5895 (c)	Collect and keep records of resin and gel coat use, organic HAP content, etc.	Y	
63.5895(d)	Initial demonstration of organic HAP emission limit or content limit	Y	
63.5900	How do I demonstrate continuous compliance with the standards?	Y	
63.5900(a)	Demonstrating compliance	Y	
63.5900(a)(2)	Compliance with emission limits using point value system	Y	
63.5900(a)(3)	Compliance with content limits using average value method or individual value method.	Y	
63.5900(a)(4)	Compliance with work practice requirements – Table 4	Y	
63.5900(b)	Reporting deviations from standards	Y	
63.5900(c)	Compliance with the applicable organic HAP emissions limits and work practice standards at all times	Y	
63.5905	What notifications must I submit and when?	Y	
63.5910	What reports must I submit and when?	Y	
63.5912	How do I submit reports?	Y	
63.5915(a)(c)(d)	What records must I keep?	Y	
63.5920	In what form and how long must I keep my records?	Y	
63.5925	What parts of the General Provisions apply to me?	Y	
Table 3, Part 6a	Tooling gel coating	Y	

IV. Source-Specific Applicable Requirements

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Table 3, Part 6b	White/off-white pigmented gel coating	Y	
Table 3, Part 6c	All other pigmented gel coating	Y	
Table 3, Part 6d	Corrosion resistant and/or high strength gel coating	Y	
Table 3, Part 6e	Fire retardant gel coat	Y	
Table 3, Part 6f	Clear production gel coat	Y	
BAAQMD Condition #9303			
Part 9a	Acetone Usage (basis: cumulative increase)	N	
Part 9b	Polyester Resin/Gelcoat Usage (basis: cumulative increase)	Y	
Part 10a	POC Emission Limit for S-3 (basis: BACT, cumulative increase)	Y	
Part 10b	NPOC Emission Limit for S-3 (basis: BACT, cumulative increase)	N	
Part 11	Record Keeping (basis: cumulative increase, Regulation 8-50-501)	Y	
Part 12	Compliance with Regulation 8-50 (basis: BACT; Regulation 8-50)	Y	
Part 13	All Spray Operations Must Be in Building (basis: Regulation 6-301, 6-305)	Y	
Part 14	No more than 1 Chopper Gun at a Time (basis: Cumulative Increase)	Y	

S-4 is exempt from the permitting requirements per Regulation 2-1-121.1.

V. SCHEDULE OF COMPLIANCE

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

VI. PERMIT CONDITIONS

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

Condition # 9303
For S-1, Filament Winder:

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

*a. Acetone	600 Gallons
b. Polyester Resin/Gelcoat	20,000 Gallons

(Basis: Cumulative Increase)

2. The owner/operator may use solvents and materials other than the materials specified in part 1, and/or usages in excess of those specified in part 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 POC 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.
   d. No ozone-depleting compounds as listed in Appendix A and B to Subpart A of 40 CFR 82 shall be used at this source.

   (Basis: BACT; Cumulative Increase)

3. The owner/operator shall keep monthly records of the following in a District-approved log for at least five 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. Such records shall be retained and available for inspection by the APCO for the previous five-year period. (Basis: Cumulative Increase; Regulation 8-50-501)

VI. Permit Conditions

4. The owner/operator of S-1 shall comply with the applicable requirements of Regulation 8, Rule 50. (Basis: BACT; Regulation 8, Rule 50)

5. [Deleted; S-2 was archived on May 24, 2016.]
6. [Deleted; S-2 was archived on May 24, 2016.]
7. [Deleted; S-2 was archived on May 24, 2016.]
8. [Deleted; S-2 was archived on May 24, 2016.]

For S-3, Chopper Guns (2):

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

*a. Acetone	600 Gallons
b. Polyester Resin/Gelcoat	30,000 Gallons

(Basis: Cumulative Increase)

10. The owner/operator may use solvents and materials other than the materials specified in part 9, and/or uses in excess of those specified in part9, provided that the owner/operator can demonstrate that the following are satisfied:
    a. Total POC emissions from S-3 do not exceed 15,814 pounds in any consecutive twelve-month period.
    *b. Total NPOC emissions from S-3 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.
    d. No ozone-depleting compounds as listed in Appendix A and B to Subpart A of 40 CFR 82 shall be used at this source.

    (Basis: BACT; Cumulative Increase)

11. The owner/operator shall keep monthly records of the following in a District-approved log for at least five 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.

    Such records shall be retained and available for inspection by the APCO for the previous 5-year period. (Basis: Cumulative Increase; Regulation 8-50-501)

12. The owner/operator of S-3 shall comply with the applicable requirements of Regulation 8-50. (Basis: BACT; Regulation 8, Rule 50)

VI. Permit Conditions

13. The owner/operator shall ensure that the spray area and all associated spray operations shall be contained within the building. (Basis: Regulation 6-301, 6-305)

14. In no case shall the owner/operator operate more than one chopper gun operate at any time. (Basis: Cumulative Increase)

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.

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

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
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 6-1-301	N		Ringelmann No. 1		N	
Opacity	SIP 6-301	Y		Ringelmann No. 1		N	
TSP	BAAQMD 6-1-311.1	N		1.78 lb/hr		N	
FP	SIP 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	
VOC	SIP 8-50-301.2	Y		VOC weight loss/emissions ≤ 60 g/m^2 surface area	BAAQMD 8-50-501.3; Condition #9303, part 3b	P/E	Records
VOC	BAAQMD 8-50-301.5	N		VOC weight loss/emissions ≤ 50 g/m^2 surface area	BAAQMD 8-50-501.3 Condition #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
VOC	BAAQMD 8-50-301.6	N		White and Off-White Gel Coats ≤ 30% (Pigmented Gel Coats)	BAAQMD 8-50-501.2 Condition #9303, part 3b	P/E	Records
VOC	BAAQMD 8-50-301.6	N		Primer Gel Coats ≤ 28% (Pigmented Gel Coats)	BAAQMD 8-50-501.2 Condition #9303, part 3b	P/E	Records
VOC	BAAQMD 8-50-301.6	N		Lamination Resins ≤ 31% with fillers or 35% without fillers (Resins)	BAAQMD 8-50-501.2 Condition #9303, part 3b	P/E	Records
VOC	SIP 8-50-304	Y		monomer content ≤ 50% by weight	BAAQMD 8-50-501.2; Condition #9303, part 3b	P/E	Records
VOC	BAAQMD 8-50-305.4	N		VOC content of cleaning material ≤ 25 g/liter	BAAQMD 8-50-501.2; Condition #9303, part 3b	P/E	Records
VOC	SIP 8-50-305.4	Y		VOC content of cleaning material ≤ 200 g/liter	SIP 8-50-501.2; Condition #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
VOC	SIP 8-50-307	Y		VOC content of gel coat, as applied ≤ 250 g/liter	BAAQMD 8-50-501.2; Condition #9303, part 3b	P/E	Records
Organic HAP	40 CFR 63 63.5805(b) & Table 3, Part 1b	Y		filament application ≤ 171 lb/ton for open molding corrosion resistant and/or high strength (CR/HS)	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63.5805(b) & Table 3, Part 2b	Y		filament application ≤ 188 lb/ton open molding non-CR/HS	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63.5805(b) & Table 3, Part 4b	Y		filament application ≤ 270 lb/ton open molding-low-flame spread/low-smoke products	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 5a	Y		Mechanical resin application ≤ 354 lb/ton open molding-shrinkage controlled resins	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) & Table 3, Part 5b	Y		filament application ≤ 215 lb/ton open molding-shrinkage controlled resins	40 CFR 63.5895, 40 CFR 63.5900	P/M	records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6a	Y		Tooling gel coat ≤ 440 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	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
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6b	Y		White/Off-white pigmented gel coat ≤ 267 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(bb) and Table 3 Part 6c	Y		All other pigmented gel coat ≤ 377 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6d	Y		Corrosion resistant and/or high strength ≤ 605 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6e	Y		Fire retardant gel coat ≤ 854 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6f	Y		Clear production gel coat ≤ 522 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Through-put	BAAQMD Condition #9303, Part 1b	Y		20,000 gallons polyester resin gelcoat, as applied, per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 3a and 3c	P/D	Records
POC	BAAQMD Condition # 9303, Part 2a	Y		7559 lbs of POC per 12-month period (limit only applies if polyester resins not used)	BAAQMD 8-50-501.4; Condition #9303, parts 3a and 3c	P/D	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
NPOC	BAAQMD Condition #9303, Part 1a	N		600 gallons of acetone per 12-month period	BAAQMD 8-50-501.4; Cond #9303, parts 3a and 3c	P/D	Records
NPOC	BAAQMD Condition #9303, Part 2b	N		3,960 lbs of NPOC per 12-month period (limit only applies if solvent other than acetone is used)	BAAQMD 8-50-501.4; Condition #9303, parts 3a and 3c	P/D	Records

Table VII-B
Applicable Limits and Compliance Monitoring Requirements
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 6-1-301	N		Ringelmann No. 1		N	
Opacity	SIP 6-301	Y		Ringelmann No. 1		N	
FP	BAAQMD 6-1-310	N		0.15 grains/dscf		N	
FP	SIP 6-310	Y		0.15 grains/dscf		N	

VII. Applicable Limits & Compliance Monitoring Requirements

Table VII-B
Applicable Limits and Compliance Monitoring Requirements
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
TSP	BAAQMD 6-1-311.1	N		1.78 lb/hr		N	
FP	SIP 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	
VOC	BAAQMD 8-50-301.5	N		VOC weight loss/emissions ≤50 g/m^2 surface area	BAAQMD 8-50-501.2; Condition #9303, part 11b	P/E	records
VOC	BAAQMD 8-50-301.6	N		White and Off-White Gel Coats ≤ 30% (Pigmented Gel Coats)	BAAQMD 8-50-501.3 Condition #9303, part 11b	P/E	Records
VOC	BAAQMD 8-50-301.6	N		Primer Gel Coats ≤ 28% (Pigmented Gel Coats)	BAAQMD 8-50-501.3 Condition #9303, part 11b	P/E	Records
VOC	BAAQMD 8-50-301.6	N		Lamination Resins ≤ 31% with fillers or 35% without fillers (Resins)	BAAQMD 8-50-501.3 Condition #9303, part 11b	P/E	Records
VOC	SIP 8-50-301.2	Y		VOC weight loss/emissions ≤ 60 g/m^2 surface area	BAAQMD 8-50-501.3; Condition #9303, part 11b	P/E	records

VII. Applicable Limits & Compliance Monitoring Requirements

Table VII-B
Applicable Limits and Compliance Monitoring Requirements
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 8-50-304	N		Corrosion resistant monomer content ≤ 50%	BAAQMD 8-50-501.3; Condition #9303, part 11b	P/E	Record
VOC	SIP 8-50-304	Y		monomer content ≤ 50% by weight	BAAQMD 8-50-501.2; Condition #9303, part 11b	P/E	records
VOC	BAAQMD 8-50-305.4	N		VOC content of cleaning material ≤ 25 g/liter	BAAQMD 8-50-501.2; Condition #9303, part 11b	P/E	records
VOC	SIP 8-50-305.4	Y		content of cleaning material ≤ 200 g/liter	SIP 8-50-501.2; Condition #9303, part b	P/E	records
VOC	SIP 8-50-307	Y		content of gel coat, as applied ≤ 250 g/liter	BAAQMD 8-50-501.2; Condition #9303, part 11b	P/E	records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 1a	Y		Mechanical resin application ≤ 113 lb/ton open molding-corrosion resistant and/or high strength (CR/HS)	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 2a	Y		Mechanical resin application ≤ 88 lb/ton open molding-non CR/HS	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records

VII. Applicable Limits & Compliance Monitoring Requirements

Table VII-B
Applicable Limits and Compliance Monitoring Requirements
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
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 3a	Y		Mechanical resin application ≤ 254 lb/ton open molding-tooling	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 4a	Y		Mechanical resin application ≤ 497 lb/ton open molding-low-fame spread/low-smoke product	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 5a	Y		Mechanical resin application ≤ 354 lb/ton open molding-shrinkage controlled resins	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6a	Y		Tooling gel coat ≤ 440 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6b	Y		White/Off-white pigmented gel coat ≤ 267 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6c	Y		All other pigmented gel coat ≤ 377 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6d	Y		Corrosion resistant and/or high strength ≤ 605 lb/ton open molding-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6e	Y		Fire retardant gel coat ≤ 854 lb/ton open-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records

VII. Applicable Limits & Compliance Monitoring Requirements

Table VII-B
Applicable Limits and Compliance Monitoring Requirements
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
Organic HAP	40 CFR 63 63.5805(b) and Table 3 Part 6f	Y		Clear production gel coat ≤ 522 lb/ton open-gel coat	40 CFR 63.5895, 40 CFR 63.5900	P/M	Records
Through-put	BAAQMD Condition #9303 Part 9b	Y		30,000 gallons resin, as applied, per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 11a and 11c	P/D	records
POC	BAAQMD Condition #9303 Part 10a	Y		15,814 pounds per 12-month period (limit only applies if polyester resins not used)	BAAQMD 8-50-501.4; Condition #9303, parts 11a and 11c	P/D	records
NPOC	BAAQMD Condition #9303 Part 9a	N		600 gallons Acetone per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 11a and 11c	P/D	records
NPOC	BAAQMD Condition #9303 Part 10b	N		3,960 pounds per 12-month period (limit only applies if solvent other than acetone is used)	BAAQMD 8-50-501.4; Condition #9303, parts 11a and 11c	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 6-1-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions; U.S. EPA Method 9
SIP 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions; U.S. EPA Method 9
BAAQMD 6-1-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling; U.S. EPA Method 5
SIP 6-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling; U.S. EPA Method 5
BAAQMD 6-1-311	General Operations	Manual of Procedures, Volume IV, ST-15, Particulates Sampling; U.S. EPA Method 5
SIP 6-311	General Operations	Manual of Procedures, Volume IV, ST-15, Particulates Sampling; U.S. EPA Method 5
BAAQMD Regulation 8-50-301.5	Process Requirements, Vapor Suppressed Resins	Manual of Procedures, Volume III, Method 23, Determination of Volatile Emissions from Polyester Resins
BAAQMD Regulation 8-50-301.6	Process Requirements, Monomer Content	Manual of Procedures, Volume III, Method 39, Determination of Styrene Monomer Content of Polyester Resin Material
SIP 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

VIII. Test Methods

Table VIII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
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
BAAQMD Regulation 8-50-307	Gel Coat Requirement	Manual of Procedures, Volume III, Method 26, Determination of Volatile Weight Loss of Gel Coats
SIP Regulation 8-50-307	Gel Coat Requirement	Manual of Procedures, Volume III, Method 26, Determination of Volatile Weight Loss of Gel Coats
40 CFR Part 63, Subpart WWWW	Determining Vapor Suppressant Effectiveness	Appendix A, Test Method for Determining Vapor Suppressed Effectiveness

IX. PERMIT SHIELD

Not Applicable.

X. REVISION HISTORY

Initial Issuance (Application 15679): July 1, 1997

Renewal (Application 3954): December 19, 2002

Reopening and minor revision (No application for reopening, Application 8164 for minor revision) July 15, 2004

- Addition of requirements of NESHAPS, 40 CFR 63, Subpart A, General Provisions Reinforced Plastic Composite Production
- Addition of requirements of NESHAPS, 40 CFR 63, Subpart WWWW, Reinforced Plastic Composite Production
- Deletion of "case-by-case" MACT requirements in 40 CFR 63.52 et seq.
- Update of Section I, Standard Conditions
- Update of Section III, Generally Applicable Requirements
- Addition of BAAQMD Regulation 6-311 to Section IV table for Source 1, Filament Winder
- Addition of revisions to BAAQMD Condition 9303 to allow use of alternative materials without an increase in emissions

Renewal (Application 15561):

- Administrative Amendments
- Change Responsible Official from Michael E. Lewis to Frank Lillo
- Change Facility Contact from Frank Lillo to Courtney van Amstel
- Change District Contact from Carol Lee to Madhav Patil

Renewal (Application 25573): February 25, 2014

Renewal (Application 29548): April 25, 2019

Renewal (Application 696275): December 10, 2024

XI. GLOSSARY

ACT
Federal Clean Air Act

APCO
Air Pollution Control Officer

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 1/26/99). 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.

XI. Glossary

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. Contained in 40 CFR Parts 61 and 63

NMHC
Non-methane Hydrocarbons (Same as NMOC)

NMOC
Non-methane Organic Compounds (Same as NMHC)

NOx
Oxides of nitrogen.

NPOC
Non-precursor organic compounds

XI. Glossary

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. 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)

XI. Glossary

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