

Bay Area Air Quality Management District

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

Permit Evaluation and Statement of Basis for

RENEWAL of MAJOR FACILITY REVIEW PERMIT

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

Facility Address:

1555 Copperhill Parkway
Santa Rosa, CA 95403

Mailing Address:

1555 Copperhill Parkway
Santa Rosa, CA 95403

May 2008

Application 15561

Application Engineer: Sanjeev Kamboj
Site Engineer: Madhav Patil

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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. A reopening and minor revision was issued on July 15, 2004. Section IX of the permit, Revision History, has a list of these revisions in chronological order.

This application is for the second renewal of the Title V permit. The standard sections of the permit have been upgraded to include new standard language used in all Title V permits. Also, various other corrections have been made to the permit. The proposed permit shows all changes to the permit in ~~strikeout~~/underline format.

The facility has not submitted any applications since the reopening and minor revision was issued on July 15, 2004.

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 has three permitted sources for their reinforced plastic composite operation: filament winding, forming in closed molds, and chopper gun. The chopper gun is used 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 adoption dates of the rules in Standard Condition I.A have been updated.
- Standard Condition I.B.1 has been amended to state that the permit continues in force after the expiration date if a complete application has been submitted in accordance with the renewal deadlines. This is the "application shield" pursuant to BAAQMD Regulation 2-6-407.

- The following language was added as Standard Condition I.B.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)." The purpose is to reiterate that the Permit Holder is responsible for ensuring that all activities at the facility comply with all applicable requirements.
- Minor typos were corrected in Standard Conditions I.D, I.E, I.F, I.G, and I.H.
- Reference to Regulation 3 as basis was deleted from Standard Conditions I.E and I.F as this regulation applies to Fees only and has no concern with Records and Monitoring Reports requirements.

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 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 whose primary function is to reduce emissions is identified by an A and a number (e.g., A-24). If a source is also an abatement device, such as when an engine controls VOC emissions, it will also be listed in the abatement device table but will have an "S" number. An abatement device may also be a source (such as a thermal oxidizer that burns fuel) of secondary emissions. If the primary function of a device is to control emissions, it is considered an abatement (or "A") device. If the primary function of a device is a non-control function, the device is considered to be a source (or "S").

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:

No changes are proposed to the permitted sources and abatement devices tables.

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:

- EPA's website address containing SIP standards has been included in Section III.
- The adoption dates of the rules have been updated.
- Regulation 6, Particulate Matter and Visible Emissions, was renumbered as Regulation 6, Rule 1, and renamed as Particulate Matter, General Requirements on December 5, 2007. The equivalent rule in the State Implementation Plan (SIP) is Regulation 6, Particulate Matter and Visible Emissions, which was approved in a Federal Register notice of September 4, 1998. The BAAQMD rule is technically not federally enforceable, although the requirements are identical. This change is also reflected in the Section IV and VII tables.

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.

BAAQMD and SIP Regulation 8, Rule 50, Polyester Resin Operations and Definition of VOC

On November 6, 1996, the definition in BAAQMD Regulation 8-50-220 was amended such that acetone, parachlorobenzotrifluoride, and cyclic, branched or linear, completely methylated siloxanes, were not considered to be VOC for the purposes of the limits in the rule. EPA has not yet approved these revisions into the SIP, so the definition of VOC is different in the BAAQMD and SIP rules. The definition affects all VOC limits in the rule, so none of the following VOC limits in the BAAQMD rule are federally enforceable: Sections 8-50-301.2, 8-50-305.4, 8-50-307, and 8-50-501.2. The monomer limits are not affected. Corrections have been made to the citations of the rule in Sections IV, VII, and VIII of the permit. Citations of the federally enforceable SIP rule have been added. The definition of VOC has been added for clarity.

These changes have a material affect on the requirements for cleanup solvent because acetone is commonly used for cleanup, but unlikely to have an affect on the resin or monomer requirements because acetone, parachlorobenzotrifluoride, and cyclic, branched or linear, completely methylated siloxanes are not commonly added to the resins.

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.

Applicability of 40 CFR Part 64, Compliance Assurance Monitoring

The facility is not subject to the Compliance Assurance Monitoring requirements of 40 CFR Part 64 as particulate emissions from S3, Chopper Guns, are expected to be insignificant and well below the major source threshold of 100 tons per year.

PM₁₀ emissions from S3 have not been quantified, as EPA AP-42 Chapter 4.4, Polyester Resin Plastic Products Fabrication, does not contain PM₁₀ emission factor for this source category.

Changes to Permit:

EPA's website address containing SIP standards has been included in Section IV.

Tables IV-A, IV-B, and IV-C

- Regulation 6, Particulate Matter and Visible Emissions, was renumbered as Regulation 6, Rule 1, and renamed as Particulate Matter, General Requirements on December 5, 2007. The equivalent rule in the State Implementation Plan (SIP) is Regulation 6, Particulate Matter and Visible Emissions, which was approved in a Federal Register notice of

September 4, 1998. The BAAQMD rule is technically not federally enforceable, although the requirements are identical. This change is reflected in the Section IV and VII tables.

- In all three tables, BAAQMD Regulation 8, Rule 50, Sections 305.4 and 501.2 are shown as being non-federally enforceable because the new definition of VOC is not in the SIP.
- The Future effective date of April 21, 2006 for various requirements of 40 CFR 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composite Production, was deleted from all three tables IV-A, IV-B, and IV-C as it exists in the past and these requirements are now effective for S-1, S-2, and S-3. It is presumed that the monitoring imposed by recent NESHAPS is sufficient.
- Part 8 of BAAQMD permit condition #9303 was added to table IV-B as it was erroneously left out in the past.
- Parts of the BAAQMD permit condition #9303 in table IV-C were renumbered after adding Part 8 to table IV-B for S-2.
- Minor typos were corrected in all three tables.

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 (12/5/07)		
6-1-301	Ringelmann No. 1 Limitation	N	
6-1-305	Visible Particles	N	
6-1-310	Particulate Weight Limitation	N	
6-1-311	General Operations	N	
6-1-401	Appearance of Emissions	N	
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
6-401	Appearance of Emissions	Y	
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	

**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
6-401	Appearance of Emissions	Y	
BAAQMD Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (11/06/96)		
8-50-110	Limited Exemption, Touch-up and Repair	Y	
8-50-220	Volatile Organic Compound	N	
8-50-301	Process Requirements	Y N	
8-50-301.1	Monomer ≤ 35 wt%	Y	
8-50-301.2	Vapor Suppressant & VOC Emission ≤ 60g/m ²	Y N	
8-50-304	Corrosion-resistant Materials	Y	
8-50-305	Surface Preparation and Clean-up Solvent	N	
8-50-305.1	Storage in Closed Containers	Y	
8-50-305.2	Self-closing Containers, Disposal	Y	
8-50-305.3	Minimizing Organic Emissions from Spray Equipment Clean-up	Y	
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter	Y N	
8-50-306	Equipment Requirements	Y	
8-50-307	Gel Coat Requirement	Y N	
8-50-501	Records	N	
8-50-501.1	List of Materials Used	Y	
8-50-501.2	List VOC Content of Materials Used	N	
8-50-501.3	Vapor-suppressed Resin Records	Y	
8-50-501.4	Daily Usage Records	Y	
8-50-501.5	Record Retention for 24 months	Y	
SIP Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (12/23/97)		
8-50-220	Volatile Organic Compound	Y	
8-50-301	Process Requirements	Y	
8-50-301.2	Vapor Suppressant & VOC Emission ≤ 60g/m ²	N Y	
8-50-305	Surface Preparation and Clean-up Solvent	Y	
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter (refers to definition in SIP 8-50 220)	Y	
8-50-307	Gel Coat Requirement	Y	
8-50-501	Records	Y	
8-50-501.2	List VOC Content of Materials Used	Y	

**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
NESHAP Part 63 Subpart A	National Emission Standards for Hazardous Air Pollutants for Source Categories		
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 Composite Production	Y	April 21, 2006
63.5805	What standards must I meet to comply with this subpart?	Y	April 21, 2006
63.5805(a)	Existing facility that is not a small business and that emits less than 100 TPY of HAP – Table 3 & Table 4.	Y	April 21, 2006
63.5810	What are my options for meeting the standards for new and existing open molding and centrifugal casting operations?	Y	April 21, 2006
63.5810(d)	Resins and gel coats HAP content – Table 3	Y	April 21, 2006
63.5835	What are my general requirements for complying with this subpart?	Y	April 21, 2006
63.5835(a)	Work practice standards in Table 4, as well as emission limits of Table 3 or 5 (without the use of add-on control equipment)	Y	April 21, 2006
63.5835(c)	Operate and maintain affected source according to provisions of 63.6(e)(1)(i)	Y	April 21, 2006
63.5840	By what date must I conduct a performance test or other initial compliance demonstration?	Y	April 21, 2006
63.5860	How do I demonstrate initial compliance with the standards?	Y	April 21, 2006
63.5860(a)	Table 8 and 9	Y	April 21, 2006
63.5895	How do I monitor and collect data to demonstrate continuous compliance?	Y	April 21, 2006
63.5895(b)	Monitor and collect data	Y	April 21, 2006
63.5895 (c)	Collect and keep records of resin and gel coat use, organic HAP content, etc.	Y	April 21, 2006
63.5895(d)	Initial demonstration of organic HAP emission limit or content limit	Y	April 21, 2006

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	How do I demonstrate continuous compliance with the standards?	Y	April 21, 2006
63.5900(a)	Demonstrating compliance	Y	April 21, 2006
63.5900(a)(2)	Compliance with emission limits using point value system	Y	April 21, 2006
63.5900(a)(3)	Compliance with content limits using average value method or individual value method.	Y	April 21, 2006
63.5900(a)(4)	Compliance with work practice requirements – Table 4	Y	April 21, 2006
63.5900(b)	Reporting deviations from standards	Y	April 21, 2006
63.5905	What notifications must I submit and when?	Y	April 21, 2006
63.5910	What reports must I submit and when?	Y	April 21, 2006
63.5915(a)(c) (d)	What records must I keep?	Y	April 21, 2006
63.5920	In what form and how long must I keep my records?	Y	April 21, 2006
63.5925	What parts of the General Provisions apply to me?	Y	April 21, 2006
Table 3, Part 1b	Open molding - corrosion resistant and/or high strength, filament application	Y	April 21, 2006
Table 3, Part 2b	Open molding - non-corrosion resistant and/or high strength, filament application	Y	April 21, 2006
Table 3, Part 4b	Open molding - low flame spread/low-smoke products, filament application	Y	April 21, 2006
Table 3, Part 5b	Open molding – shrinkage controlled resin, filament application	Y	April 21, 2006
Table 3, Part 6a	Tooling gel coating	Y	April 21, 2006
Table 3, Part 6b	White/off-white pigmented gel coating	Y	April 21, 2006
Table 3, Part 6c	All other pigmented gel coating	Y	April 21, 2006
Table 3, Part 6d	Corrosion resistant and/or high strength gel coating	Y	April 21, 2006
Table 3, Part 6e	Fire retardant gel coat	Y	April 21, 2006
Table 3, Part 6f	Clear production gel coat	Y	April 21, 2006
BAAQMD Condition #9303			
Part 1	Usage (basis: offsets, cumulative increase)	Y	

**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 2	Material Usage Specifications and Emission Limits for S-1 (basis: BACT, cumulative increase)	Y	
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	

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6, Rule 1	Particulate Matter, General Requirements (12/5/07)		
6-1-301	Ringelmann No. 1 Limitation	N	
6-1-305	Visible Particles	N	
6-1-310	Particulate Weight Limitation	N	
6-1-401	Appearance of Emissions	N	
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-401	Appearance of Emissions	Y	
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			

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (11/06/96)		
8-50-110	Limited Exemption, Touch-up and Repair	Y	
8-50-220	Volatile Organic Compounds	N	
8-50-301	Process Requirements	Y N	
8-50-301.3	Closed Mold System	Y	
8-50-304	Corrosion-resistant Materials	Y	
8-50-305	Surface Preparation and Clean-up Solvent	N 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	N Y	
8-50-307	Gel Coat Requirement	Y N	
8-50-501	Records	N Y	
8-50-501.1	List of Materials Used	Y	
8-50-501.2	List VOC Content of Materials Used	N 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	
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	N Y	
8-50-305	Surface Preparation and Clean-up Solvent	Y	
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter (refers to definition in SIP 8-50 220)	Y	
8-50-307	Gel Coat Requirement	Y	
8-50-501	Records	Y	
8-50-501.2	List VOC Content of Materials Used	Y	
40 CFR 63 Subpart WWW	National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production	Y	April 21, 2006
63.5805	What standards must I meet to comply with this subpart?	Y	April 21,

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
			2006
63.5805(a)	Existing facility that is not a small business and that emits less than 100 TPY of HAP – Table 3 & Table 4.	Y	April 21, 2006
63.5810	What are my options for meeting the standards for new and existing open molding and centrifugal casting operations?	Y	April 21, 2006
63.5810(d)	Resins and gel coats HAP content – Table 3	Y	April 21, 2006
63.5835	What are my general requirements for complying with this subpart?	Y	April 21, 2006
63.5835(a)	Work practice standards in Table 4, as well as emission limits of Table 3 or 5 (without the use of add-on control equipment)	Y	April 21, 2006
63.5835(c)	Operate and maintain affected source according to provisions of 63.6(e)(1)(i)	Y	April 21, 2006
63.5840	By what date must I conduct a performance test or other initial compliance demonstration?	Y	April 21, 2006
63.5860	How do I demonstrate initial compliance with the standards?	Y	April 21, 2006
63.5860(a)	Table 8 and 9	Y	April 21, 2006
63.5895	How do I monitor and collect data to demonstrate continuous compliance?	Y	April 21, 2006
63.5895(b)	Monitor and collect data	Y	April 21, 2006
63.5895 (c)	Collect and keep records of resin and gel coat use, organic HAP content, etc.	Y	April 21, 2006
63.5895(d)	Initial demonstration of organic HAP emission limit or content limit	Y	April 21, 2006
63.5900	How do I demonstrate continuous compliance with the standards?	Y	April 21, 2006
63.5900(a)	Demonstrating compliance	Y	April 21, 2006
63.5900(a)(2)	Compliance with emission limits using point value system	Y	April 21, 2006
63.5900(a)(3)	Compliance with content limits using average value method or individual value method.	Y	April 21, 2006
63.5900(a)(4)	Compliance with work practice requirements – Table 4	Y	April 21, 2006

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.5900(b)	Reporting deviations from standards	Y	April 21, 2006
63.5905	What notifications must I submit and when?	Y	April 21, 2006
63.5910	What reports must I submit and when?	Y	April 21, 2006
63.5915(a)(c)(d)	What records must I keep?	Y	April 21, 2006
63.5920	In what form and how long must I keep my records?	Y	April 21, 2006
63.5925	What parts of the General Provisions apply to me?	Y	April 21, 2006
Table 3, Part 6a	Tooling gel coating	Y	April 21, 2006
Table 3, Part 6b	White/off-white pigmented gel coating	Y	April 21, 2006
Table 3, Part 6c	All other pigmented gel coating	Y	April 21, 2006
Table 3, Part 6d	Corrosion resistant and/or high strength gel coating	Y	April 21, 2006
Table 3, Part 6e	Fire retardant gel coat	Y	April 21, 2006
Table 3, Part 6f	Clear production gel coat	Y	April 21, 2006
BAAQMD Condition #9303			
Part 5	Usage (basis: offsets, cumulative increase)	Y	
Part 6	Material Usage Specifications and Emission Limits for S-2 (basis: BACT, cumulative increase)	Y	
Part 7	Record Keeping (basis: cumulative increase, Regulation 8-50-501)	Y	
Part 8	Compliance with Regulation 8-50 (basis: BACT; Regulation 8-50)	Y	

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6, Rule 1	Particulate Matter, General Requirements (12/5/07)		
6-1-301	Ringelmann No. 1 Limitation	N	
6-1-305	Visible Particles	N	
6-1-310	Particulate Weight Limitation	N	
6-1-401	Appearance of Emissions	N	
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-401	Appearance of Emissions	Y	
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 (11/06/96)		
8-50-110	Limited Exemption, Touch-up and Repair	Y	
8-50-220	Volatile Organic Compounds	N	
8-50-301	Process Requirements	Y/N	
8-50-301.1	Monomer ≤ 35 wt%	Y	
8-50-301.2	Vapor Suppressant & VOC Emission ≤ 60g/m ²	Y/N	
8-50-302	Spraying Operations	Y	
8-50-302.1	Airless Spray	Y	
8-50-302.2	Air-Assisted Airless Spray	Y	
8-50-302.3	Electrostatic Spray	Y	
8-50-302.4	HVLP	Y	
8-50-304	Corrosion-resistant Materials	Y	
8-50-305	Surface Preparation and Clean-up Solvent	NY	
8-50-305.1	Storage in Closed Containers	Y	

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
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	NY	
8-50-307	Gel Coat Requirement	YN	
8-50-501	Records	NY	
8-50-501.1	List of Materials Used	Y	
8-50-501.2	List VOC Content of Materials Used	NY	
8-50-501.3	Vapor-suppressed Resin Records	Y	
8-50-501.4	Daily Usage Records	Y	
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/m ²	NY	
8-50-305	Surface Preparation and Clean-up Solvent	Y	
8-50-305.4	Clean-up Solvent, VOC ≤ 200g/liter (refers to definition in SIP 8-50 220)	Y	
8-50-307	Gel Coat Requirement	Y	
8-50-501	Records	Y	
8-50-501.2	List VOC Content of Materials Used	Y	
NESHAP Part 63 Subpart A	National Emission Standards for Hazardous Air Pollutants for Source Categories		
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 WWW	National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production	Y	April 21, 2006
63.5805	What standards must I meet to comply with this subpart?	Y	April 21, 2006
63.5805(a)	Existing facility that is not a small business and that emits less than 100 TPY of HAP – Table 3 & Table 4.	Y	April 21, 2006

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.5810	What are my options for meeting the standards for new and existing open molding and centrifugal casting operations?	Y	April 21, 2006
63.5810(d)	Resins and gel coats HAP content – Table 3	Y	April 21, 2006
63.5835	What are my general requirements for complying with this subpart?	Y	April 21, 2006
63.5835(a)	Work practice standards in Table 4, as well as emission limits of Table 3 or 5 (without the use of add-on control equipment)	Y	April 21, 2006
63.5835(c)	Operate and maintain affected source according to provisions of 63.6(e)(1)(i)	Y	April 21, 2006
63.5840	By what date must I conduct a performance test or other initial compliance demonstration?	Y	April 21, 2006
63.5860	How do I demonstrate initial compliance with the standards?	Y	April 21, 2006
63.5860(a)	Table 8 and 9	Y	April 21, 2006
63.5895	How do I monitor and collect data to demonstrate continuous compliance?	Y	April 21, 2006
63.5895(b)	Monitor and collect data	Y	April 21, 2006
63.5895 (c)	Collect and keep records of resin and gel coat use, organic HAP content, etc.	Y	April 21, 2006
63.5895(d)	Initial demonstration of organic HAP emission limit or content limit	Y	April 21, 2006
63.5900	How do I demonstrate continuous compliance with the standards?	Y	April 21, 2006
63.5900(a)	Demonstrating compliance	Y	April 21, 2006
63.5900(a)(2)	Compliance with emission limits using point value system	Y	April 21, 2006
63.5900(a)(3)	Compliance with content limits using average value method or individual value method.	Y	April 21, 2006
63.5900(a)(4)	Compliance with work practice requirements – Table 4	Y	April 21, 2006
63.5900(b)	Reporting deviations from standards	Y	April 21, 2006
63.5905	What notifications must I submit and when?	Y	April 21,

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

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
			2006
63.5910	What reports must I submit and when?	Y	April 21, 2006
63.5915(a)(c)(d)	What records must I keep?	Y	April 21, 2006
63.5920	In what form and how long must I keep my records?	Y	April 21, 2006
63.5925	What parts of the General Provisions apply to me?	Y	April 21, 2006
Table 3, Part 6a	Tooling gel coating	Y	April 21, 2006
Table 3, Part 6b	White/off-white pigmented gel coating	Y	April 21, 2006
Table 3, Part 6c	All other pigmented gel coating	Y	April 21, 2006
Table 3, Part 6d	Corrosion resistant and/or high strength gel coating	Y	April 21, 2006
Table 3, Part 6e	Fire retardant gel coat	Y	April 21, 2006
Table 3, Part 6f	Clear production gel coat	Y	April 21, 2006
BAAQMD Condition #9303			
Part 89	Usage (basis: offsets, cumulative increase)	Y	
Part 910	Material Usage Specifications and Emission Limits for S-3 (basis: BACT, cumulative increase)	Y	
Part 4011	Record Keeping (basis: cumulative increase, Regulation 8-50-501)	Y	
Part 4112	Compliance with Regulation 8-50 (basis: BACT; Regulation 8-50)	Y	
Part 4213	All Spray Operations Must Be In Building (basis: Regulation 6-301, 6-305)	Y	
Part 4314	No more than 1 Chopper Gun At a Time (basis: Cumulative Increase)	Y	

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:

One minor typo was corrected in this section.

VI. Permit Conditions

Each permit condition is identified with a unique numerical identifier, up to five digits.

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, subject to consideration of comments received.

The existing permit conditions are 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 is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

- BACT: This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.

- **Cumulative Increase:** This term is used for a condition imposed by the APCO that limits a source's operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- **Offsets:** This term 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 term 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 term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy.

Changes to Permit:

- A minor typo was corrected in Condition 9303, part 2.c.
- Condition 9303 was modified to include source description "S-2, Closed Mold Vacuum" to better indicate which conditions apply to this source.
- Minor typos were corrected in Condition 9303, parts 6.a., 6.b., and 6.c.
- A requirement for S-2 to comply with all applicable requirements of Regulation 8, Rule 50 was incorporated as part 8 of Condition 9303.
- Condition 9303 was modified to include source description "S-3, Chopper Guns (2)" to better indicate which conditions apply to this source.
- Renumbered different parts of Condition 9303 applicable to S-3 after adding part 8 as mentioned above.
- Minor typos were corrected in Condition 9303, parts 10.a., 10.b., and 10.c.

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 Condition 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 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~~ 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)
4. The owner/operator of S-1 and S-2 shall comply with the applicable requirements of Regulation 8, Rule 50. (basis: BACT; Regulation 8, Rule 50)

For S-2, Closed Mold Vacuum:

5. The owner/operator of S-2 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)
6. The owner/operator may use solvents and materials other than the materials specified in Part 5, and/or uses in excess of those specified in ~~Condition 1~~part5, provided that the owner/operator can demonstrate that the following are satisfied:
 - a. Total POC emissions from S-~~12~~ do not exceed 3,453 pounds in any consecutive twelve month period.
 - *b. Total NPOC emissions from S-~~12~~ 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~~ 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)
7. 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)

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

For S-3, Chopper Guns (2):

89. 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)

910. The owner/operator may use solvents and materials other than the materials specified in part 8, and/or uses in excess of those specified in part 89, provided that the owner/operator can demonstrate that the following are satisfied:

- a. Total POC emissions from S-43 do not exceed 15,814 pounds in any consecutive ~~twelve month~~ twelve-month period.
 - *b. Total NPOC emissions from S-43 do not exceed 3,960 pounds in any consecutive ~~twelve month~~ twelve-month period.
 - c. The use of these materials does not increase toxics emissions above any risk screening trigger level, except for ~~styrene which~~ 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)

~~1011.~~ 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)

~~112.~~ The owner/operator of S-3 shall comply with the applicable requirements of Regulation 8-50. (basis: BACT; Regulation 8, Rule 50)

~~1213.~~ The owner/operator shall ensure that the spray area and all associated spray operations shall be contained within the building. (basis: Regulation 6-1-301, 6-1-305)

1314. In no case shall the owner/operator operate more than one chopper gun operate at any time. (basis: Cumulative Increase)

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.

The District has reviewed all monitoring and has determined the existing monitoring is adequate to provide a reasonable assurance of compliance.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements. It follows that, although Title V calls for a re-examination of all monitoring, there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation. Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate.

PM Discussion:

This facility is a small source of particulate emissions. Hence, no PM monitoring is required.

POC Discussions:

The NESHAPS and Regulation 8, Rule 50 monitoring is adequate. Also, POC limits for all three sources are contained in permit conditions, which also contain adequate monitoring- daily records, and summations.

Changes to Permit:

- The following statement was added to Section VII:

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.

Tables IV-A, IV-B, and IV-C:

- The future effective date of April 21, 2006 for various requirements of 40 CFR 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, was deleted from all three tables VII-A, VII-B, and VII-C as it exists in the past and these requirements are now effective for S-1, S-2, and S-3. It is presumed that the monitoring imposed by recent NESHAPS is sufficient.
- Renumbered different parts of Condition 9303 in table VII-C applicable to S-3 after adding part 8 as mentioned above.

BAAQMD and SIP Regulation 8, Rule 50, Polyester Resin Operations and Definition of VOC

On November 6, 1996, the definition in BAAQMD Regulation 8-50-220 was amended such that acetone, parachlorobenzotrifluoride, and cyclic, branched or linear, completely methylated siloxanes, were not considered to be VOC for the purposes of the limits in the rule. EPA has not yet approved these revisions into the SIP, so the definition of VOC is different in the BAAQMD and SIP rules. The definition affects all VOC limits in the rule, so none of the following VOC limits in the BAAQMD rule are federally enforceable: Sections 8-50-301.2, 8-50-305.4, 8-50-307, and 8-50-501.2. The monomer limits are not affected. Corrections have been made to the citations of the rule in Sections IV, VII, and VIII of the permit. Citations of the federally enforceable SIP rule have been added. The definition of VOC has been added for clarity.

These changes have a material affect on the requirements for cleanup solvent because acetone is commonly used for cleanup, but unlikely to have an affect on the resin or monomer requirements because acetone, parachlorobenzotrifluoride, and cyclic, branched or linear, completely methylated siloxanes are not commonly added to the resins.

**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	
FP	BAAQMD 6-1-310	✗N		0.15 grains/dscf		N	
FP	SIP 6-310	Y		0.15 grains/dscf		N	
FP	BAAQMD 6-1-311	✗N		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	
FP	SIP 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	
VOC	BAAQMD 8-50-301.1	Y		monomer content \leq 35% by weight	BAAQMD 8-50-501.2; Cond #9303, part 3b	P/E	records
VOC	BAAQMD 8-50-301.2	✗N		VOC weight loss/emissions \leq 60 g/m ² surface area	BAAQMD 8-50-501.3; Cond #9303, part 3b	P/E	records
VOC	SIP 8-50-301.2	Y		VOC weight loss/emissions \leq 60 g/m ² surface area	BAAQMD 8-50-501.3; Cond #9303, part 3b	P/E	records
VOC	BAAQMD 8-50-304	Y		monomer content \leq 50% by weight	BAAQMD 8-50-501.2; Cond #9303, part 3b	P/E	records
VOC	BAAQMD 8-50-305.4	N		VOC content of cleaning material \leq 200 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 3b	P/E	records
VOC	SIP 8-50-305.4	Y		VOC content of cleaning material \leq 200 g/liter	SIP 8-50-501.2; Cond #9303, part 3b	P/E	records

**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	40 CFR 63 Subpart WWWW 63.5805(a) & Table 3, Part 1b	Y	April 21, 2006	filament application \leq 171 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) & Table 3, Part 2b	Y	April 21, 2006	filament application \leq 188 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) & Table 3, Part 4b	Y	April 21, 2006	filament application \leq 270 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) & Table 3, Part 5b	Y	April 21, 2006	filament application \leq 215 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 5a	Y	April 21, 2006	Mechanical resin application \leq 354 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6a	Y	April 21, 2006	Tooling gel coat \leq 437 lb/ton	63.5810	P/M	Records

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	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6b	Y	April 21, 2006	White White/Off-white pigmented gel coat ≤ 267 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6c	Y	April 21, 2006	All other pigmented gel coat ≤ 377 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6d	Y	April 21, 2006	Corrosion resistant and/or high strength ≤ 605 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6e	Y	April 21, 2006	Fire retardant gel coat ≤ 854 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6f	Y	April 21, 2006	Clear production gel coat ≤ 522 lb/ton	63.5810	P/M	Records
Through-put	BAAQMD Condition #9303, Part 1b	Y		20,000 gallons resin, as applied, per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 3a and 3c	P/D	records

**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
POC	BAAQMD Condition # 9303, Part 2a			7559 lbs per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 3a and 3c	P/D	records
NPOC	BAAQMD Condition #9303, Part 1a	✗N		600 gallons 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 per 12-month period	BAAQMD 8-50-501.4; Cond #9303, parts 3a and 3c	P/D	records

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

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-1-301	✗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	
FP	BAAQMD 6-1-311	✗N		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	
FP	SIP 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	

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

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-50-305.4	N		content of cleaning material \leq 200 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 3b	P/E	records
	BAAQMD 8-50-305.4	Y		content of cleaning material \leq 200 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 7b	P/E	records
VOC	40 CFR 63 Subpart WWW 63.5805(a) and Table 3 Part 6a	Y	April 21, 2006	Tooling gel coat \leq 437 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWW 63.5805(a) and Table 3 Part 6b	Y	April 21, 2006	White/Off-white pigmented gel coat \leq 267 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWW 63.5805(a) and Table 3 Part 6c	Y	April 21, 2006	All other pigmented gel coat \leq 377 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWW 63.5805(a) and Table 3 Part 6d	Y	April 21, 2006	Corrosion resistant and/or high strength \leq 605 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWW 63.5805(a) and Table 3 Part 6e	Y	April 21, 2006	Fire retardant gel coat \leq 854 lb/ton	63.5810	P/M	Records

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

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6f	Y	April 21, 2006	Clear production gel coat ≤ 522 lb/ton	63.5810	P/M	Records
Through-put	BAAQMD Condition #9303, Part 1b	Y		20,000 gallons resin, 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			7559 lbs per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 3a and 3c	P/D	records
NPOC	BAAQMD Condition #9303, Part 1a	Y		600 gallons per 12-month period	BAAQMD 8-50-501.4; Cond #9303, parts 3a and 3c	P/D	records
NPOC	BAAQMD Condition #9303, Part 2b	Y		3,960 lbs per 12-month period	BAAQMD 8-50-501.4; Cond #9303, parts 3a and 3c	P/D	records

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

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-1-301	✗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	
FP	BAAQMD 6-1-311	✗N		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	
FP	SIP 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr		N	
VOC	BAAQMD 8-50-301.1	Y		monomer content \leq 35% by weight	BAAQMD 8-50-501.2; Cond #9303, part 4011b	P/E	records
VOC	BAAQMD 8-50-301.2	N✗		weight loss/emissions \leq 60 g/m ² surface area	BAAQMD 8-50-501.3; Cond #9303, part 4011b	P/E	records
VOC	SIP 8-50-301.2	Y		weight loss/emissions \leq 60 g/m ² surface area	BAAQMD 8-50-501.3; Cond #9303, part 11b	P/E	records
VOC	BAAQMD 8-50-304	Y		monomer content \leq 50% by weight	BAAQMD 8-50-501.2; Cond #9303, part 4011b	P/E	records
VOC	BAAQMD 8-50-305.4	✗N		VOC content of cleaning material \leq 200 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 4011b	P/E	records
VOC	SIP 8-50-305.4	Y		VOC content of cleaning material \leq 200 g/liter	SIP 8-50-501.2; Cond #9303, part 40b	P/E	records

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

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-50-307	Y/N		VOC content of gel coat, as applied \leq 250 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 4011b	P/E	records
VOC	SIP 8-50-307	N		VOC content of gel coat, as applied \leq 250 g/liter	BAAQMD 8-50-501.2; Cond #9303, part 11b	P/E	records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 1a	Y	April 21, 2006	Mechanical resin application \leq 112 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 2a	Y	April 21, 2006	Mechanical resin application \leq 87 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 3a	Y	April 21, 2006	Mechanical resin application \leq 254 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 4a	Y	April 21, 2006	Mechanical resin application \leq 497 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 5a	Y	April 21, 2006	Mechanical resin application \leq 354 lb/ton	63.5810	P/M	Records

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

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6a	Y	April 21, 2006	Tooling gel coat \leq 437 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6b	Y	April 21, 2006	White/Off-white pigmented gel coat \leq 267 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6c	Y	April 21, 2006	All other pigmented gel coat \leq 377 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6d	Y	April 21, 2006	Corrosion resistant and/or high strength \leq 605 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6e	Y	April 21, 2006	Fire retardant gel coat \leq 854 lb/ton	63.5810	P/M	Records
VOC	40 CFR 63 Subpart WWWW 63.5805(a) and Table 3 Part 6f	Y	April 21, 2006	Clear production gel coat \leq 522 lb/ton	63.5810	P/M	Records

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

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Condition #9303 Part 89b	Y		30,000 gallons resin, as applied, per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 4011a and 4011c	P/D	records
VOC	BAAQMD Condition #9303 Part 9b10a	Y		15,814 pounds per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 4011a and 4011c	P/D	records
NPOC	BAAQMD Condition #9303 Part 89a	Y		600 gallons Acetone per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 4011a and 4011c	P/D	records
NPOC	BAAQMD Condition #9303 Part 910b	Y		3,960 pounds per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 4011a and 4011c	P/D	records
	BAAQMD Condition #9303, Part 1b	Y		20,000 gallons resin, as applied, per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 3a and 3c	P/D	records
	BAAQMD Condition # 9303, Part 2a			7559 lbs per 12-month period	BAAQMD 8-50-501.4; Condition #9303, parts 3a and 3c	P/D	records
NPOC	BAAQMD Condition #9303, Part 1a	Y		600 gallons per 12-month period	BAAQMD 8-50-501.4; Cond #9303, parts 3a and 3c	P/D	records

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

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
NPOC	BAAQMD Condition #9303, Part 2b	Y		3,960 lbs per 12-month period	BAAQMD 8-50-501.4; Cond #9303, parts 3a and 3c	P/D	records

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:

Test methods have been added for the limits in BAAQMD Sections 6-1-301, 6-1-310, and 6-1-311.

Citations for SIP Regulation 8, Rule 50, have been added. These changes have been discussed in Sections C.IV and C.VII of this statement of basis. The methods for determining the content of parachlorobenzotrifluoride and volatile methylsiloxanes have been deleted from the citation for SIP Regulation 8-50-305.4 because the SIP rule does not exclude these compounds from the definition of VOC.

**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
BAAQMD 6-1-310	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;

**Table VIII
Test Methods**

Applicable Requirement	Description of Requirement	Acceptable Test Methods
		U.S. EPA Method 5
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
SIP 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
SIP Regulation 8-50-305.4	Surface Preparation and Clean up Solvent, VOC Content	Manual of Procedures, Volume III, Method 43, Determination of Volatile Methylsiloxanes in Solvent Based Coatings, Inks and Related Materials
SIP Regulation 8-50-307	Gel Coat Requirement	Manual of Procedures, Volume III, Method 26, Determination of Volatile Weight Loss of Gel Coats

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:

Added new Section IX, Permit Shield to the Title V permit. The facility status remains the same (i.e., it has no permit shields).

X. Revision History:

The revision history will be updated when the revision is issued.

XI. Glossary:

Changes to the glossary:

APCO

Air Pollution Control Officer

dscf

Dry Standard Cubic Feet

XII. Applicable State Implementation Plan:

Changes to Permit:

This section has been deleted as the applicable regulations and rules from the State Implementation Plan are no longer attached to the permit.

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 renewal.

E. Compliance Status:

A June 26, 2008 office memorandum from the Director of Compliance and Enforcement to the Director of Engineering presents a review of the compliance record of the facility, which is attached in Appendix A. The Compliance and Enforcement Division staff has reviewed the records for the period from June 27, 2003 to June 26, 2008. This review was initiated as part of the District evaluation of the application for a Title V permit renewal. During the period subject to review, activities known to the District include:

- The District did not issue any Notices of Violation.
- The District received no air pollution complaints alleging Western Fiberglass as the source.
- The District did not receive any notifications for Reportable Compliance Activities (RCA).
- There are no enforcement agreements, open variances, or open abatement orders for Western Fiberglass.

The Compliance and Enforcement Division has made a determination that for the five-year period Western Fiberglass was in intermittent compliance. There is no evidence of on-going non-compliance and no recurring pattern of violations that would warrant consideration of a Title V permit compliance schedule.

F. Differences between the Application and the Proposed Permit:

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

Appendix A
Compliance Report

COMPLIANCE & ENFORCEMENT DIVISION

Inter-Office Memorandum

June 26, 2008

TO: BRIAN BATEMAN – DIRECTOR OF ENGINEERING *BB*
FROM: KELLY WEE – DIRECTOR OF ENFORCEMENT *W. Kim for*
SUBJECT: REVIEW OF COMPLIANCE RECORD OF

WESTERN FIBERGLAS #A7974

Background

This review was initiated as part of the District evaluation of an application by WESTERN FIBERGLAS for a Title V Permit Renewal. It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of a renewal of a Title V Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior five-year permit term have been adequately addressed, or, if non-compliance persists, that a schedule of compliance is properly incorporated into the Title V permit compliance schedule. In addition, the review checks for patterns of recurring violation that may be addressed by additional permit terms. Finally, the review is intended to recommend, if necessary, any additional permit conditions and limitations to improve compliance.

Compliance Review

Staff reviewed WESTERN FIBERGLAS Annual Compliance Certifications for June 27, 2003 to June 26, 2008 and found no ongoing non-compliance and no recurring pattern of violations.

Staff also reviewed the District compliance records for WESTERN FIBERGLAS for June 27, 2007 through June 26, 2008. During this period WESTERN FIBERGLAS activities known to the District include:

The District did not issue any Notices of Violation

The District received no air pollution complaints alleging Western Fiberglas as the source.

The District did not receive any notifications for Reportable Compliance Activities (RCA).

There are no enforcement agreements, open variances, or open abatement orders for Western Fiberglass.

Conclusion

The Compliance and Enforcement Division has made a determination that for the five year period WESTERN FIBERGLAS was in intermittent compliance. There is no evidence of on-going non-compliance and no recurring pattern of violations that would warrant consideration of a Title V permit compliance schedule.