777 12th Street 3rd Floor SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT Sacramento, CA 95814

STATEMENT OF BASIS FOR RENEWAL OF TITLE V FEDERAL OPERATING PERMIT

Title V Permit No.: TV2013-18-01
Date: 09/14/2018
Reviewing Engineer: Jorge DeGuzman

FACILITY INFORMATION:

FACILITY NAME: D&T Fiberglass Company, Inc.

LOCATION: 8900 Osage Avenue
Sacramento, CA

MAILING ADDRESS: 8900 Osage Avenue
Sacramento, CA 95828

RESPONSIBLE OFFICIAL: Don Stommel, Jr.
President
(916) 383-9012

CONTACT PERSON: Lane Johnson
Operations Manager
(916) 383-9012

PURPOSE OF THIS STATEMENT OF BASIS

The Title V Federal Operating Permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose of this Statement of Basis is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This Statement of Basis also includes background narrative and explanations of regulatory decisions made by the SMAQMD. It should be emphasized that this Statement of Basis, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

PERMIT ACTIONS

This Statement of Basis is for the second renewal of D&T Fiberglass Company's existing Title V Federal Operating Permit No. TV2013-18-01.

No permit actions have been completed since the Title V Federal Operating Permit No. TV2002-18-01 was issued:

Permit Action	Date Issued	Permit No.
Initial Title V Federal Operating Permit	07-20-2004	TV2004-18-01
First Renewal Title V Federal Operating Permit	07-20-2009	TV2008-18-01

FACILITY DESCRIPTION

The following facility description is for informational purposes only and does not contain any applicable federally enforceable requirements.

D&T Fiberglass Company, Inc. is required to obtain a Title V Federal Operating Permit because the facility has a potential to emit greater than 10 tons/year of a single HAP (hazardous air pollutant). That HAP is styrene which results from the use of resins in the fiberglass product manufacturing process.

D&T Fiberglass Company is a manufacturer of reinforced plastic composites. The facility custom fabricates reinforced plastic composites parts on an order basis. The composition, shape and size of the fiberglass composite parts varies significantly from one project to the next. As a result, a wide variety of resins, gel coats and colorants are used. Specialty resins for high temperature and corrosion resistance are also used. Products may or may not receive a gel coat and may also be surfaced with a pigmented resin coating.

In general the fabrication process begins with construction of a new mold or use of an existing mold. Open molds are constructed of wood, metal and plastics. They may also be a molded composite with a high temperature specialty gel coat to facilitate parting. Molds are prepared for use by solvent cleaning and using mold release agents and waxes. Emissions from mold preparation are based on conservation of mass calculations to determine the mass of VOC in the materials applied.

Once molds are fabricated and prepared, the gel coat application and lamination process begins. If a part requires a gel coat finish, the mold is staged in the gel coat spray booth and gel coat is spray applied to the mold and allowed to cure. Gel coat particulate matter overspray and styrene emissions from styrene used in the gel coat formulation are collected in the ventilation system of the gel coat booth. Particulate matter is separated from the exhaust air by the booth filters. The styrene emissions are not captured and exhaust to the atmosphere. Gel coat material may contain up to 45% by weight styrene and does not contain a vapor suppressant due to the need to adhere subsequent layers. The gel coat material historically used at D&T Fiberglass ranges from 25% to 38% styrene by weight.

Once the gel coat is cured the part is moved to the lamination booth. Parts that do not have a gel coat begin at this booth. Most parts are mechanically sprayed with catalyzed resin and fiberglass that are mixed in a chopper gun. The fiberglass material is rolled to remove any voids and air bubbles and to compact the composite material. A small amount of manual resin operations are also performed where fiberglass mats are laid on the part and resin applied manually by brush or roller.

Lamination operations may use non-specialty resins containing up to 35% styrene by weight. Historically, D&T Fiberglass Company has used such non-specialty resins with a styrene content of 31% to 35% by weight.

Specialty resins are used for parts intended for use in high temperature or corrosive environments. These specialty resins may contain up to 50% styrene by weight. Historically, D&T Fiberglass Company has used such specialty resins with a styrene content of 46% to 49% by weight.

FACILITY DESCRIPTION

In addition to the open mold process to produce fiberglass reinforced plastic parts, D&T Fiberglass Company also uses a filament winder to produce fiberglass reinforced plastic pipe. Pipe is fabricated on a mandrel in two layers. The inner core uses isophthalic resin (specialty resin) and the outer layer uses standard ortho resin. The filament winder draws up to 40 fiberglass strands through a saturation tray containing the catalyzed resin and applies it to the turning mandrel on which the pipe is formed. Styrene emissions associated with the filament winder are less than the open mold process because there is no spraying process and therefore no air atomization of the resin.

Once the lamination process is complete and the part has cured, it is demolded and finished. The finishing operation may involve the use of small amounts of body putty, adhesives, application of latex paints, drilling, sanding, installation of hardware and other miscellaneous operations. The finishing operation with the greatest potential for emissions is the application of a coating of resin mixed with colorant and a wax. This finish coat imparts a glossy colored coating that is an alternative to a gel coat.

D&T Fiberglass Company also uses solvents to clean application equipment. Acetone is the primary solvent used. Acetone is an solvent exempt from air pollution control regulations because it does not contribute to the formation of ozone and is not a hazardous air pollutant. Two types of VOC containing solvents are used in enclosed gun cleaners. Spent solvent from the enclosed gun cleaners is disposed of in drums and removed by a registered waste disposal company.

SIGNIFICANT EMISSIONS UNIT DESCRIPTION

A. Gel Coat Spray Room
SMAQMD Rule 201 Permit to Operate No. 21466
(permit number is for reference purposes only - not federally enforceable)

Size: 16' W x 12' H x 30' D
Spray method: air-assisted airless or non-atomized mechanical spray equipment

B. Gel Coat Spray Booth
SMAQMD Rule 201 Permit to Operate No. 21466
(permit number is for reference purposes only - not federally enforceable)

Size: 15' W x 10' H x 25' D
Spray method: air-assisted airless or non-atomized mechanical spray equipment

C. Lamination Layup Spray Room
SMAQMD Rule 201 Permit to Operate No. 21466
(permit number is for reference purposes only - not federally enforceable)

Size: 35' W x 12' H x 35' D
Spray method: air-assisted airless or non-atomized mechanical spray equipment

D. Filament Winding Machine
SMAQMD Rule 201 Permit to Operate No. 21466
(permit number is for reference purposes only - not federally enforceable)

Manufacturer: Dura-Wound Dura Winder
Model No.: 20

E. Miscellaneous Processes
SMAQMD Rule 201 Permit to Operate No. 21466
(permit number is for reference purposes only - not federally enforceable)

1. Mold Preparation
2. Finishing Operations
3. Equipment Cleanup

FACILITY EMISSIONS

Equipment Description	Basis for the Exemption
Forklifts, propane fueled	SMAQMD Rule 201 Section 111.1 Vehicles used to transport passengers or freight.
Internal combustion engine, 28 hp, driving compressor	SMAQMD Rule 201 Section 112.1 Internal combustion engines with a manufacturer's maximum continuous rating of 50 hp or less.
Welding and shop equipment Abrasive blasting process	SMAQMD Rule 201 Section 122 Other equipment which would emit any pollutant, without the benefit of air pollution control devices, at a rate less than 2 pounds in any 24 hour period.
Acetone solvent cleaning	← acetone is a material exempt from air pollution control regulations because it: a. is not defined as a reactive organic compound (VOC) by SMAQMD Rule 101 Section 204.28. b. is not a federal Hazardous Air Pollutant (HAP). c. is not a California Toxic Air Pollutant (TAC).

ALTERNATIVE OPERATING SCENARIOS

None requested by permittee.

FACILITY EMISSIONS

Equipment	Maximum Allowable Annual Emissions (A) tons per year						
	VOC	NOx	SO2	PM10	CO	Single HAP	Total HAPs
Fiberglass reinforced product manufacturing process	24.4	0	0	0	0	24.4	24.4

(A) Based on current SMAQMD Permit to Operate No. 21466 that limits VOC emissions to 24.4 tons of VOC/year.

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements

SMAQMD Rule 101 - General Provisions and Definitions

SIP approved: 08-09-2012 (77 FR 47535)

Rule Description: This rule provides definitions of terms, specifies authority to arrest and specifies what data is public information.

Compliance Status: The rule does not require the permittee to take any actions.

SMAQMD Rule 102 - Circumvention

SIP approved: 12-05-1984 (49 FR 47490)
[05-15-1972 adopted, 11-29-1983 renumbered version]

Rule Description: This rule prohibits concealment of emissions and specifies how compliance determinations are made for combined and separated emissions.

Compliance Status: The permittee complies with the rule requirements.

SMAQMD Rule 105 - Emission Statement

This SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination:

SIP approved: 06-06-2008 (73 FR 32240)
[09-05-1996 amended version]

Rule Description: This rule requires the facility to provide annual emission data for VOC and NOx if VOC and NOx emissions are greater than 25 tons/year.

Compliance Status: The permittee is not subject to this rule because the maximum permitted VOC and NOx emissions are less than 25 tons/year.

The permittee is not required to comply with the rule requirements.

SMAQMD Rule 201 - General Permit Requirements

SIP approved: 07-13-1987 (52 FR 26148)
[11-20-1984 amended version]
NOTE - the current 08-24-2006 version of this rule is not SIP approved.

Rule Description: This rule provides an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

Compliance Status: The permittee complies with the rule requirements.

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 202 - New Source Review

SIP approved: SIP approval of 11-20-1984 rule version was withdrawn on 08-19-2011.
08-23-2012 rule version is the current version and is not SIP approved. This rule is not federally enforceable.

Rule Description: This rule sets the procedures for review of new and modified stationary sources and provides the mechanisms for evaluating the applicability of BACT and/or offset requirements.

Compliance Status: The permittee's past permit actions have been in compliance with this rule

SMAQMD Rule 203 - Prevention of Significant Deterioration

SIP Approved: 07-20-2011 (76 FR 43183)
01-27-2011 rule version is SIP approved.

Rule Description: The Prevention of Significant Deterioration (PSD) program is a construction permitting program for new major facilities and major modifications to existing major facilities located in areas classified as attainment or in areas that are unclassifiable for any regulated NSR pollutant including greenhouse gases. The intent of this Rule is to incorporate the federal PSD rule requirements into the District's Rules and Regulations by incorporating the federal requirements by reference.

Compliance Status: The permittee's future permitting actions will be reviewed under this rule.

SMAQMD Rule 207 - Title V Federal Operating Permits

SIP Approved: 11-21-2003 (68 FR 65637) (as part of the Title V Federal Operating Permit program approval)
07-28-2011 rule version is the current version and it has not been formally approved by EPA.

Rule Description: This rule sets forth the procedures for review, issuance and renewal of Title V operating permits.

Compliance Status: The permittee has submitted a timely and complete Title V initial permit application.
The permittee complies with the rule requirements.

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements

SMAQMD Rule 214 - Federal New Source Review

SIP Approved: 08-29-2013 (78 FR 53271)
08-23-2012 rule version is SIP approved.

Rule Description: This rule sets the procedures for review of emissions units at new and modified major stationary sources and provides the mechanisms for evaluating the applicability of BACT and/or offset requirements.

Compliance Status: This is a recently adopted and SIP approved rule. The permittee's equipment will be reviewed pursuant to this rule, if applicable, for all future permitting actions.

SMAQMD Rule 217 - Public Notice Requirements for Permits

SIP Approved: 08-29-2013 (78 FR 53271)
08-23-2012 rule version is SIP approved.

Rule Description: This rule provides an administrative mechanism for public notification and review of the issuance of authorities to construct and permits to operate at new and modified stationary air pollution sources.

Compliance Status: The permittee has not added or modified equipment since this rule was adopted. All future permit actions at the facility will comply with this rule as appropriate.

SMAQMD Rule 301 - Permit Fees *(Title V related fees only)*

SIP approved: The rule is not SIP approved but the portions of the rule related to Title V permit fees are applicable because they are part of the SMAQMD Title V Federal Operating Permit program approved by U.S. EPA on 11-21-2003 (68 FR 65637).

Rule Description: This rule requires Title V sources to pay specified fees.

Compliance Status: The permittee complies with the rule requirements.

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements

SMAQMD Rule 307 - Clean Air Act Fees

This SMAQMD rule is not an applicable federal requirement for this facility but is discussed here to document the non-applicability determination:

SIP approved: 08-26-2003 (68 FR 51184)
[09-26-2002 adopted version]

Rule Description: This rule requires major sources of VOC and NOx to pay specified fees beginning after the U.S. EPA determines that the SMAQMD has failed to demonstrate attainment of the one hour ozone ambient air quality standard by the attainment year.

Compliance Status: Under the current federal ozone non-attainment designation for the Sacramento area, a facility is not classified as a major source if VOC or NOx emissions are less than 25 tons/year. The facility is not subject to this rule because the maximum permitted VOC and NOx emissions are less than 25 tons/year.

The rule may become applicable in the future if the federal ozone non-attainment designation for the Sacramento area changes the definition of major source.

The permittee is not required to comply with the rule requirements.

SMAQMD Rule 401 - Ringelmann Chart

SIP approved: 02-01-1984 (49 FR 3987)
[04-19-1983 amended version]

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The permittee complies with the rule requirements.

SMAQMD Rule 403 - Fugitive Dust

SIP approved: 12-05-1984 (49 FR 47490)
08-03-1977 rule version is SIP approved.
[11-29-1983 adopted version]

Rule Description: This rule regulates operations which may cause fugitive dust emissions into the atmosphere.

Compliance Status: The permittee complies with the rule requirements.

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements

SMAQMD Rule 404 - Particulate Matter

SIP approved: 07-13-1987 (52 FR 26148)
[11-20-1984 adopted version]

Rule Description: This rule regulates the emission of particulate matter into the atmosphere.

Compliance Status: The permittee complies with the rule requirements.

SMAQMD Rule 442 - Architectural Coatings

SIP approved: 10-04-2016 (81 FR 68320)
[09-24-2015 amended version]

Rule Description: This rule limits the quantity of volatile organic compounds in architectural coatings supplied, sold, offered for sale, applied, solicited for application or manufactured for use within the SMAQMD.

Compliance Status: The affected coatings used by the permittee are received and stored in containers that display the required manufacturer's labels and demonstrate compliance with the rule's requirements.

The permittee complies with the rule requirements.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 460 - Adhesives and Sealants

SIP approved: **Not** SIP approved.

Rule Description: This rule limits the emission of volatile organic compounds (VOCs) from adhesives and sealants and associated primers, and from related surface preparation solvents, cleanup solvents and strippers.

Compliance Status: The permittee is expected to comply with the requirements of the rule.

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements

SMAQMD Rule 465 - Polyester Resin Operations

SIP approved: 07-26-2011 (76 FR 44493)
09-25-2008 rule version is SIP approved.

Rule Description: This rule limits the emission of volatile organic compounds from polyester resin operations.

Compliance Status: The permittee complies with the rule requirements.

SMAQMD Rule 466 - Solvent Cleaning

SIP approved: 09-29-2011 (76 FR 60376)
10-28-2010 rule version is SIP approved.

Rule Description: This rule reduces the emissions of volatile organic compounds from solvent cleaning operations and activities, and from the storage and disposal of new and spent cleaning solvents.

Compliance Status: The affected solvent cleaning materials used by the permittee are expected to comply with the requirements of the rule.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination:

SMAQMD Rule 701 - Emergency Episode Plan

This SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination:

SIP approved: 09-05-2000 (65 FR 53602)
[05-27-1999 amended version]

Rule Description: This rule requires the permittee to prepare a plan for specific actions to be taken when health related levels of ozone, carbon monoxide or PM10 are exceeded.

Compliance Status: This rule is applicable to facilities that emit 50 tons/year or more of VOC or NOx or 100 tons/year or more of PM10 or CO. The maximum allowable VOC and NOx emissions from this facility are less than 50 tons/year.

The permittee is not required to comply with this rule.

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements

40 CFR 68 (begin at 68.1) - Chemical Accident Prevention Provisions

Promulgated: 01-31-1994 (59 FR 4493)
[04-09-2004 (69 FR 18831) most recent amendment]

Rule Description: This regulation specifies requirements for owners or operators of stationary sources concerning the prevention of accidental chemical releases.

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, must comply with the requirements of 40 CFR Part 68.

40 CFR 68.215 requires that the air permitting authority include in the Title V permit for a facility specified statements regarding the regulation. Those statements are included in the *Federally Enforceable Requirements - General* section of the permit.

Compliance Status: The permittee stores less than the designated amounts of the specified chemical substances in 40 CFR 68 and is currently exempt from the requirements of the regulation.

40 CFR 82 Subpart F (begin at 82.150) - Protection of Stratospheric Ozone - Recycling and Emissions Reduction

Promulgated: 05-14-1993 (58 FR 28712)
[04-13-2005 (70 FR 19278) most recent amendment]

Rule Description: The purpose of this subpart is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

This subpart applies to any person servicing, maintaining or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale and persons purchasing class I or class II refrigerants.

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements

As indicated in 40 CFR 70.6, Title V permits need to assure compliance with all applicable requirements at the time of permit issuance. Part 70 defines as an applicable requirement, "Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Act, unless the Administrator has determined that such requirements need not be contained in a Title V permit." [40 CFR 70.2(12)]. The applicable requirements of Title VI are included in the *Federally Enforceable Requirements - General* section of the permit.

Compliance Status: The permittee employs qualified contractors to maintain equipment that contains class I or class II refrigerants.

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Fiberglass Product Manufacturing Process

Permit Conditions - SMAQMD Rule 201 Permit to Operate No. 21466

Condition Description: SMAQMD Rule 201 Permit to Operate for the fiberglass product manufacturing process limits mass emissions, limits monomer content and requires recordkeeping and reporting.

[Condition Nos. 1, 2, 3 and 4 of the SMAQMD Rule 201 Permit to Operate are not federally enforceable.]

40 CFR 63 Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production (begin at 63.5780)

Promulgated: 03-05-2004 (69 FR 10511)

Rule Description: This federal regulation limits the emission of HAP from reinforced plastics composites production located at major sources of HAP.

Rule Compliance: The requirements of the NESHAP became effective on April 21, 2006 during the first five year term of the facility's Title V permit. The initial Title V permit identified the requirements as "future effective" requirements. The permittee has been in compliance with the requirements since the effective date of Subpart WWWW.

(See discussion of streamlining of multiple applicable requirements at the end of this section titled "Equipment Specific Requirements - Fiberglass Product Manufacturing Process.)

40 CFR 64 Compliance Assurance Monitoring:

This federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination:

Promulgated: 10-22-1997 (52 FR 54940)

Rule Description: This federal regulation specifies monitoring requirements for Title V sources that will assure compliance with emission limitations or standards.

Rule Compliance: Section 64.2 (a)(2) of this rule states that if “The unit uses a control device to achieve compliance with any such emission limitation or standard”, then the facility is subject to CAM. The facility does not employ any control devices to achieve compliance with the emission limits of the permit. Therefore, CAM does not apply

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Fiberglass Product Manufacturing Process

Streamlining Multiple Applicable Requirements:

The Fiberglass Product Manufacturing Process is subject to the following overlapping Applicable Federally Enforceable Requirements:

A. Recordkeeping

Basis of Requirement	Applicable Requirements Recordkeeping
40 CFR 63 Subpart WWWW NESHAP for Reinforced Plastics Composites Production (begin at 63.5780)	1. 40 CFR 63.5920(b) Keep records for 5 years. 2. 40 CFR 63.5920(c) Keep records onsite for 2 years and offsite for 3 years.
Title V permit condition V.B.7 based on SMAQMD Rule No. 201 Section 405	1. Keep records for 5 years. 2. Keep records onsite for 5 years.

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The most stringent requirements are the permit conditions based on SMAQMD Rule 201 Section 405, which will be included in the Title V permit.

NON-FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide and Equipment Specific Requirements

SMAQMD Rule 202 - New Source Review

SIP Approved: Not SIP approved

Rule Description: This rule sets the procedures for review of new and modified stationary sources and provides the mechanisms for evaluating the applicability of BACT and/or offset requirements.

Compliance Status: The permittee's past permit actions have been in compliance with this rule.

SMAQMD Rule 204 - Emission Reduction Credits

SIP Approved: Not SIP approved

Rule Description: This rule provides an administrative mechanism for quantifying, adjusting and certifying surplus emission reductions.

Compliance Status: The permittee's past permit actions have been in compliance with this rule.

SMAQMD Rule 301 - Permit Fees - Stationary Source

SIP approved: Not SIP approved.

Rule Description: This discussion applies to the sections of the rule that require fees for SMAQMD Rule 201 permits and not to the sections that require fees for Title V permits.

This rule requires the facility to pay fees associated with the issuance and renewal of SMAQMD Rule 201 permits.

Compliance Status: The permittee complies with the rule requirements.

SMAQMD Rule 306 - Air Toxic Fees

SIP approved: Not SIP approved.

Rule Description: This rule requires the facility to pay fees associated with toxic emissions regulated through the California "Toxic Hotspot" Program.

Compliance Status: The permittee complies with the rule requirements.

NON-FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide and Equipment Specific Requirements

SMAQMD Rule 602 - Breakdown Conditions: Emergency Variance

SIP approved: Not SIP approved.

Rule Description: This rule requires the facility to notify the SMAQMD of any equipment breakdowns that cause an emission violation and to follow specific procedures.

Compliance Status: The permittee complies with the rule requirements.

TITLE V PERMIT RECOMMENDATION:

It is recommended that the D&T Fiberglass Company, Inc. Title V Federal Operating permit be renewed.

See proposed Title V Federal Operating Permit No. TV2008-18-01 for permit conditions.

Approved by: _____ Date: _____

ATTACHMENT A

SMAQMD RULES THAT ARE

"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"

FOR D&T FIBERGLASS COMPANY, INC.

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR D&T FIBERGLASS COMPANY, INC.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	101	General Provisions and Definitions 10-27-2011 version	**Yes** - no related conditions are included in the permit because of the general nature of the rule.
●	●	102	Circumvention 11-29-1983 version	**Yes** - no related conditions are included in the permit because of the general nature of the rule.
	●	103	Exceptions 11-29-1983 version	**No** - source does not operate the type of equipment described in this rule.
	●	104	General Conformity 11-03-1994 version	**No** - the rule's purpose is to have the SMAQMD review federal conformity findings.
	●	105	Emission Statement 04-20-1993 version	**No** - the facility emissions are less than the applicability level of this rule.
		107	Alternative Compliance	**No** - it is not a SIP approved rule.
●		108	Minor Violations	**No** - it is not a SIP approved rule.
●	●	201	General Permit Requirements 11-20-1984 version	**Yes** - no related conditions are included in the permit because of the general nature of the rule.
●	●	202	New Source Review 11-20-1984 version	**Yes** - New and modified permits issued under this rule prior to 8/19/11contain related conditions that are included

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR D&T FIBERGLASS COMPANY, INC.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
				in the Title V permit.
●		202	New Source Review	**No** - it is not a SIP approved rule.
●	●	203	Prevention of Significant Deterioration 01-27-2011 version	**Yes** - no related conditions are included in the permit because of the general nature of the rule.
		204	Emission Reduction Credits	**No** - it is not a SIP approved rule.
		205	Community Bank and Priority Reserve Bank	**No** - it is not a SIP approved rule.
		206	Mobile and Transportation Source Emission Reduction Credits	**No** - it is not a SIP approved rule.
●	✱	207	Title V Federal Operating Permit Program	**Yes** - related conditions are included in the permit. (✱Although this is not a SIP approved rule it is applicable because it is part of the SIP approved SMAQMD Title V Permit Program.)
●		208	Acid Rain	**No** - it is not a SIP approved rule. *Note: there is an equivalent federal regulation.*
		209	Limiting Potential to Emit	**No** - it is not a SIP approved rule.

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR D&T FIBERGLASS COMPANY, INC.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		210	Synthetic Minor Source Status	**No** - it is not a SIP approved rule.
		211	MACT at Major Sources of Hazardous Air Pollutants	**No** - it is not a SIP approved rule.
		213	Federal Major Modifications	**No** - it is not a SIP approved rule.
●	●	214	Federal New Source Review 08-23-2012 version	**Yes** - The existing permits were issued before the adoption date of this rule.
		215	Agricultural Permit Requirements and New Agricultural Permit Review	**No -** it is not a SIP approved rule.
●	●	217	Public Notice Requirements for Permits 08-23-2012 version	**Yes** - no related conditions are included in the permit because of the general nature of the rule.
●	*	301	Stationary Source Permit Fees	**Yes** - related conditions are included in the permit. (*Although this is not a SIP approved rule, Title V related fees in the rule are applicable because it is part of the SIP approved SMAQMD Title V Permit Program.)
●		302	Hearing Board Fees	**No** - it is not a SIP approved rule.

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR D&T FIBERGLASS COMPANY, INC.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		303	Agricultural Burning Permit Fees	**No** - it is not a SIP approved rule.
		304	Plan Fees	**No** - it is not a SIP approved rule.
		305	Environmental Document Preparation and Processing Fees	**No** - it is not a SIP approved rule.
●		306	Air Toxics Fees	**No** - it is not a SIP approved rule.
●	●	307	Clean Air Act Fees 09-26-2002 version	**No** - the facility emissions are less than the applicability level of this rule.
		310	Permit Fees - Agricultural Source	**No** - it is not a SIP approved rule
●	●	401	Ringelmann Chart 04-05-1983 version	**Yes** - related conditions are included in the permit.
●		402	Nuisance	**No** - it is not a SIP approved rule.
●	●	403	Fugitive Dust 11-29-1983 version	**Yes** - related conditions are included in the permit.
●	●	404	Particulate Matter 11-20-1984 version	**Yes** - related conditions are included in the permit.

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR D&T FIBERGLASS COMPANY, INC.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	●	405	Dust and Condensed Fumes 11-29-1983 version	**No** - the source does not operate such a process.
	●	406	Specific Contaminants 11-29-1983 version	**No** - the source does not operate such a process.
	●	407	Open Burning 11-29-1983 version	**No** - the source does not operate such a process.
	●	408	Incinerator Burning 11-29-1983 version	**No** - the source does not operate an incinerator.
	●	409	Orchard Heaters 11-29-1983 version	**No** - the source does not operate orchard heaters.
	●	410	Reduction of Animal Matter 11-29-1983 version	**No** - the source does not operate equipment for the reduction of animal matter.
	●	411	Boiler NOx 08-23-2007 version	**No** - the source does not operate a boiler subject to this rule.
	●	412	Stationary IC Engines at Major Stationary	**No** - the source does not operate an IC engine with a rated

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR D&T FIBERGLASS COMPANY, INC.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
			Sources of NOx 06-01-1995 version	capacity that is greater than the applicability level of the rule (>50 hp).
	●	413	Stationary Gas Turbines 03-24-2005 version	**No** - the source does not operate such a process.
●	●	414	Natural Gas Fired Water Heaters 03-25-2010 version	**Yes** - no related conditions are included in the permit because of general nature of the rule.
	●	417	Wood Burning Appliances 10-26-2006 version	**No -** it is not a SIP approved rule.
●	●	420	Sulfur Content of Fuels 11-29-1983 version	**Yes** - no related conditions are included in the permit because of limited applicability (water heater).
●	●	441	Organic Solvents 11-29-1983 version	**Yes** - no related conditions are included in the permit because of limited applicability.
●	●	442	Architectural Coatings 09-24-2015 version	**Yes** - related conditions are included in the permit.
	●	443	Leaks from Synthetic Organic Chemical and Polymer Manufacturing 09-05-1996 version	**No** - the source does not operate synthetic organic chemical or polymer manufacturing equipment.

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR D&T FIBERGLASS COMPANY, INC.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	●	444	Petroleum Solvent Dry Cleaning 11-29-1983 version	**No** - the source does not operate petroleum solvent dry cleaning equipment.
	●	446	Storage of Petroleum Products 11-16-1993 version	**No** - the source does not store affected petroleum products.
	●	447	Organic Liquid Loading 04-02-1998 version	**No** - the source does not operate organic liquid loading equipment.
	●	448	Gasoline Transfer into Stationary Storage Containers 02-26-2009 version	**No** - the source does not operate gasoline transfer equipment.
	●	449	Transfer of Gasoline into Vehicle Fuel Tanks 02-26-2009 version	**No** - the source does not operate gasoline transfer equipment.
	●	450	Graphic Arts Operations 10-23-2008 version	**No** - the source does not operate a graphic arts process as defined in the rule.
	●	451	Surface Coating of Miscellaneous Metal Parts and Products 10-28-2010 version	**No** - the source does not operate such a process.
	●	452	Can Coating 09-25-2008 version	**No** - the source does not operate a can coating process.

SMAQMD RULES THAT ARE
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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	●	453	Cutback and Emulsified Asphalt Paving Materials 11-29-1983 version	**No** - the source does not manufacture or apply cutback or emulsified asphalt paving materials.
	●	454	Degreasing Operations 09-25-2008 version	**No** - the source does not operate degreasers subject to this rule.
	●	455	Pharmaceuticals Manufacturing 11-29-1983 version	**No** - the source does not manufacture pharmaceuticals.
	●	456	Aerospace Coating Operations 10-23-2008 version	**No** - the source does not coat aerospace parts.
		457	Methanol Compatible Tanks	**No** - it is not a SIP approved rule.
	●	458	Large Commercial Bread Bakeries 09-05-1996 version	**No** - the source does not produce bread products.
	●	459	Automotive, Truck and Heavy Equipment Refinishing Operations 08-25-2011 version	**No** - the source does not refinish vehicles.
●		460	Adhesives and Sealants	**No** - it is not a SIP approved rule.

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR D&T FIBERGLASS COMPANY, INC.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	●	463	Wood Products Coatings 09-25-2008 version	**No** - it is not a SIP approved rule.
	●	464	Organic Chemical Manufacturing Operations 09-25-2008 version	**No** - the source does not manufacture organic chemicals.
●	●	465	Polyester Resin Operations 09-25-2008	**No** - it is not a SIP approved rule.
●	●	466	Solvent Cleaning 10-28-2010 version	**Yes** - related conditions included in the permit.
		485	Municipal Landfill Gas	**No** - it is not a SIP approved rule.
		496	Large Confined Animal Facilities	**No** - it is not a SIP approved rule.
	●	501	Agricultural Burning 11-29-1983 version	**No** - the source does not conduct agricultural burning.
●		601	Procedure before the Hearing Board	**No** - it is not a SIP approved rule.
●		602	Breakdown Conditions: Emergency Variance	**No** - it is not a SIP approved rule.
	●	701	Emergency Episode Plan	**No** - the facility emissions are less than the applicability

SMAQMD RULES THAT ARE
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FOR D&T FIBERGLASS COMPANY, INC.

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
			05-27-1999 version	level of this rule.
		801	New Source Performance Standards	**No** - it is not a SIP approved rule. *Note: there are equivalent federal regulations.*
		901	General Requirements	**No** - it is not a SIP approved rule. *Note: there are equivalent federal regulations.*
		902	Asbestos	**No** - it is not a SIP approved rule. *Note: there is an equivalent federal regulation.*
		903	Mercury	**No** - it is not a SIP approved rule. *Note: there is an equivalent federal regulation.*
		904	Airborne Toxic Control Measures	**No** - it is not a SIP approved rule. *Note: there are equivalent federal regulations for some of the listed ATCMs.*
		1002	Fleet Inventory	**No** - it is not a SIP approved rule.
		1003	Reduced-Emission Fleet Vehicles/Alternative Fuels	**No** - it is not a SIP approved rule.
		1005	Mobile Source Emission Reduction	**No** - it is not a SIP approved rule.

SMAQMD RULES THAT ARE
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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
			Credits/Banking	
		1006	Transportation Conformity	**No** - it is not a SIP approved rule.

ATTACHMENT B

SMAQMD RULE 201 PERMITS TO OPERATE

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SACRAMENTO METROPOLITAN

AIR QUALITY
MANAGEMENT DISTRICT

PERMIT TO OPERATE

Issued to: D&T Fiberglass Company, Inc.

Equipment Location: 8900 Osage Avenue, Sacramento 95828

Permit No.	Equipment Description
21466	Fiberglass manufacturing process consisting of: 1. Gel Coat Spray Room, fabricated in house, 16'W x 12'H x 30'D, 10 hp exhaust fan. 2. Gel Coat Spray Booth, Viking, Model unknown, 15'W x 10'H x 25'D, automotive dry filter type, 3 hp exhaust fan. 3. Lamination Layup Spray Room, fabricated in house, 35'W x 12'H x 35'D, two exhaust fan motors, 2 hp each. 4. Filament Winding Machine, Dura-Wound Dura Winder, Model No. 20. 5. Miscellaneous Processes - Mold Preparation, Finishing Operations, Equipment Cleanup

SUBJECT TO THE FOLLOWING CONDITIONS:

GENERAL REQUIREMENTS

1. The equipment shall be properly maintained.

2. The SMAQMD Air Pollution Control Officer and/or authorized representatives, upon the presentation of credentials, shall be permitted:

   A. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this Permit to Operate.

   B. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this Permit to Operate.

   C. To inspect any equipment, operation or method required in this Permit to Operate.

   D. To sample emissions from the source or require samples to be taken.

DATE ISSUED: 07-02-2009
DATE EXPIRES: 05-14-2010 (unless renewed)

Larry Greene
SMAQMD Air Pollution Control Officer

by: Bruce Nixon

Permit to Operate No.: 21466

REVOCABLE AND NON-TRANSFERABLE

3. This Permit to Operate does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3, of the California Health and Safety Code or the rules and regulations of the SMAQMD.

4. A legible copy of this Permit to Operate shall be maintained on the premises with the equipment.

EMISSION LIMIT REQUIREMENTS

5. The fiberglass product manufacturing process shall not discharge into the atmosphere any visible air contaminants other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour, which are as dark or darker than Ringelmann No. 1 or equivalent to or greater than 20% opacity.
[Basis: SMAQMD Rule 401]

6. Emissions from the reinforced plastic composites manufacturing process shall not exceed the following limits:
[Basis: SMAQMD Rule 202]

Pollutant	Maximum Allowable Emissions				
	Quarter 1 lb/quarter	Quarter 2 lb/quarter	Quarter 3 lb/quarter	Quarter 4 lb/quarter	Yearly (A) tons/year
ROC	13,500	13,650	13,800	13,800	24.4

(A) The yearly ROC emissions shall be calculated on the basis of a 12 month rolling average.

7. Compliance with the emission limitations specified in Condition No. 6 shall be determined as follows:
[Basis: SMAQMD Rule 202]

ROC emissions (lb/quarter) = **[1]** HAP ROC emissions + **[2]** Non-HAP ROC emissions

Where:

[1] HAP ROC emissions are calculated as follows:

HAP ROC emissions (lb/quarter) = Sum of HAP emissions from each HAP containing material used.

= [HAP containing material usage, lb/quarter] / [2000 lb/ton] x [HAP emission factor from Table 1 of 40 CFR 63 Subpart WWWW]

(see Attachment A for Table 1 which is included for reference purposes only)

"HAP" as used above includes styrene, methyl methacrylate and other organic HAP.

"HAP containing material" as used above includes, but is not limited to, resins, gel coats, additives, cleaners, waxes, catalysts, adhesives and cleanup solvents that contain HAP.

[2] Non-HAP ROC emissions are calculated as follows:

Non-HAP ROC emissions (lb/quarter] = [Non-HAP ROC containing material usage, lb/quarter] x [% ROC by weight in the material]

"ROC containing material" as used above includes, but is not limited to, additives, cleaners, waxes, catalysts, adhesives, cleanup solvents and non-HAP containing resins or gel coats. ***If a material contains both HAP and non-HAP ROC the non-HAP portion of the ROC shall be calculated in this category.***

8. The permittee shall not exceed the 12 month rolling average organic HAP emission limit specified in Table 3 of 40 CFR 63 Subpart WWWW.
[Basis: 40 CFR 63.5805(b)]

(See Attachment B for Table 3 which is included for reference purposes only.)

9. The permittee, for open molding operations, may use one of the methods specified in 40 CFR 63.5810 (a) - (d) to meet the standards in Condition No. 8.

A. The permittee may switch between the compliance options listed, but must comply with the requirements for switching specified in 40 CFR 63.5810.
[Basis: 40 CFR 63.5810]

(See Attachment C for 40 CFR 63.5810 which is included for reference purposes only.)

EQUIPMENT OPERATION REQUIREMENTS

10. Polyester resin operations performed at this facility shall comply with **one** of the following process or control requirements:
[Basis: SMAQMD Rule 465]

A. Use low-VOC polyester resins	Type of Material	Maximum Allowable Monomer Content % by weight as applied
	Resins, except specialty resins and gel coats	35
	Pigmented gel coats	45
	Specialty resins and clear gel coats	50

— or —

B. Use a polyester resin containing vapor suppressant	Weight loss from VOC emissions shall not exceed 60 grams per square meter of exposed surface area during resin polymerization as determined by SMAQMD Rule 465 Section 504.1.

— or —

C. Use a closed-mold system	No limit on monomer content.

11. The use of cleaning materials, as defined in SMAQMD Rule No. 465 Section 204, shall comply with **all** of the following VOC limits when used in polyester resin operations:
[Basis: SMAQMD Rule 465]

Cleaning Method Used in the Polyester Resin Operation	Maximum Allowable VOC Content grams/liter (lb/gal)
A. Prior to September 25, 2009: Cleaning with material not used in an enclosed gun cleaner and to clean molds, spray or other dispensing equipment.	204 (1.7)
B. Prior to September 25, 2009: Cleaning with material used in an enclosed gun cleaner as defined in Rule 465 Section 209.	No limit on VOC content
C. Prior to September 25, 2009: To clean molds, spray equipment or other dispensing equipment tools used in gel coat or specialty resin operations that come in direct contact with polyester resin products, provided the usage of cleaning materials does not exceed 16 gallons/month.	No limit on VOC content
D. Effective September 25, 2009: All cleaning materials.	25 (0.21)

12. Polyester resin operations shall use closed containers to store all polyester resin materials, cleaning materials and any unused VOC containing materials, except when accessed for use.
[Basis: SMAQMD Rule 465]

13. Polyester resin operations shall use closed containers for the disposal of all uncured polyester resin materials, cleaning materials, waste materials and any unused VOC containing materials.
[Basis: SMAQMD Rule 465]

14. The permittee shall comply with the work practice standards specified in 40 CFR 63 Subpart WWWW Table 4.
[Basis: 40 CFR 63.5805(b)]

(See Attachment D for Table 4 which is included for reference purposes only.)

15. The application method to be used when spray applying polyester resin materials shall be any one of the following:

    A. Airless spray.

    B. Air-assisted airless spray.

    C. High-volume low-pressure (HVLP) spray.

    D. Low-volume low-pressure (LVLP) spray.

    E. Electrostatic spray.

    F. Non-atomized mechanical spray, including but not limited to fluid impingement spray guns.
    [Basis: SMAQMD Rule No. 465 except for F. which is from 40 CFR 63 Subpart WWWW]

16. The permittee shall operate and maintain the affected source according to the provisions of 40 CFR 63.6(e)(1)(i) as follows:
    [Basis: 40 CFR 63.5835 (c)]

    A. **[40 CFR 63.6(e)(1)(i)]** At all times, including periods of startup, shutdown and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

        i. During a period of startup, shutdown or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices.

        ii. The general duty to minimize emissions during a period of startup, shutdown or malfunction does not require the owner or operator to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.

        iii. Determination of whether such operation and maintenance procedures are being used will be based on information available to the SMAQMD Air Pollution Control Officer which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

MONITORING REQUIREMENTS

None

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SACRAMENTO METROPOLITAN
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RECORDKEEPING AND REPORTING REQUIREMENTS

17. The permittee shall continuously maintain onsite the following records for the most recent five year period and shall make such records available to the SMAQMD Air Pollution Control Officer upon request. Monthly and quarterly records shall be made available within 30 days of the end of the reporting period. **[Basis: SMAQMD Rule 202 and 465]**

Frequency	Information to be recorded
At all times	List of currently used materials including: A. Types of resins, catalysts, filler materials, pigments and cleaning materials. B. Monomer content of all resins. (recordkeeping units are % by weight). C. VOC content of all cleaning materials others than acetone. (recordkeeping units are grams/liter or lb/gal) D. Weight loss per square meter during resin polymerization for each vapor-suppressed resin and the amount of such resin used. Alternatively, the Vapor Suppressant Effectiveness (VSE) as supplied by the resin manufacturer may be recorded.
Monthly	E. Quantity of all ROC containing materials used. (recordkeeping units are lb or gallons/month) ["ROC containing materials" includes, but is not limited to, additives, cleaners, waxes, catalysts, adhesives, cleanup solvents, resins and gel coats.] F. If the permittee chooses to comply with Condition No. 8 by using one of the averaging methods in 40 CFR 63.5810**(b)** or 40 CFR 63.5810**(c)** then: i. For 40 CFR 63.5810**(b)**: a. Calculation of the 12 month rolling <u>average HAP emissions factor</u>. (recordkeeping units are lb/ton) — **or** — ii. For 40 CFR 63.5810**(c)**: a. Calculation of the 12 month rolling <u>weighted average HAP emission limit</u>. (recordkeeping units are lb/ton) b. Calculation of the 12 month rolling <u>actual weighted average HAP emissions factor</u>. (recordkeeping units are lb/ton) G. Calculation of the rolling 12 month average ROC emissions by the method specified in Condition No. 7 except that lb/preceding 12 months is used in place of lb/quarter in the equation. (recordkeeping units are tons ROC/preceding 12 months)

Frequency	Information to be recorded
Quarterly	H. Calculation of quarterly ROC mass emissions by the method specified in Condition No. 7. (recordkeeping units are lb ROC/quarter).

18. Effective April 21, 2006, the permittee shall keep the following records as specified in 40 CFR 63.5915. **[Basis: 40 CFR 63.5915]**

Frequency	Information to be recorded
At all times	A. A copy of each notification and report submitted to comply with 40 CFR 63 Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted. B. All data, assumptions and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5 and 7 to 40 CFR 63 Subpart WWWW. C. A certified statement that operation of the facility is in compliance with the work practice requirements in Table 4 to 40 CFR 63 Subpart WWWW, as applicable.

19. Effective April 21, 2006, the permittee shall keep the records required in Condition No. 18 in the following form and length of time.

    A. Maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

    B. As specified in 40 CFR 63.10(b)(1), each record shall be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record.

    C. Each record shall be kept onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report or record, according to 40 CFR 63.10(b)(1). Records may be kept offsite for the remaining 3 years.

    D. Records shall be kept in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape or microfiche.

    [Basis: 40 CFR 63.5920]

20. Effective April 21, 2006, the permittee shall submit a Compliance Report to the SMAQMD Air Pollution Control Officer by the dates specified. The Compliance report shall contain the following information: **[Basis: 40 CFR 63.5910]**

Frequency	Information to be reported
July 30 for the period Jan 01 through June 30 and January 30 for the period July 01 through Dec 31	A. Company name and address. B. Statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy and completeness of the content of the report. C. Date of the report and beginning and ending dates of the reporting period. D. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to 40 CFR 63 Subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. E. For each deviation from a organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in 40 CFR 63 Subpart WWWW, the compliance report must contain the following information. This includes periods of startup, shutdown and malfunction. i. The total operating time of each affected source during the reporting period. ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

EMISSION TESTING REQUIREMENTS

There are no periodic emission testing requirements.

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

Your application for this air quality Permit to Operate was evaluated for compliance with Sacramento Metropolitan Air Quality Management District (SMAQMD), state and federal air quality rules. The following SMAQMD rules are those that are most applicable to the operation of your equipment. Other SMAQMD rules may also be applicable.

SMAQMD Rule No.	Rule Title
201	General Permit Requirements
202	New Source Review
301	Stationary Source Permit Fees
401	Ringelmann Chart
402	Nuisance
465	Polyester Resin Operations
U.S. EPA NESHAP	40 CFR 63 Subpart WWWW National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production [begin at 63.5780]

In addition, the conditions on this Permit to Operate may reflect some, but not all, requirements of these rules. There may be other conditions that are applicable to the operation of your equipment. Future changes in prohibitory rules may establish more stringent requirements which may supersede the conditions listed here.

For further information please consult your SMAQMD rulebook or contact the SMAQMD for assistance.

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SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT

ATTACHMENT A

(for reference purposes only)

Table 1 to Subpart WWWW of Part 63--Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams[1]

As specified in §63.5810, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams:

If your operation type is a new or existing...	And you use...	With...	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat)	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat)
1. open molding operation	a. manual resin application	i. nonvapor-suppressed resin	EF = 0.126 x %HAP x 2000	EF = ((0.286 x %HAP)-0.0529) x 2000
		ii. vapor-suppressed resin	EF = 0.126 x %HAP x 2000 x (2-(3.5 x VSB factor))	EF = ((0.286 x %HAP)-0.0529) x 2000 x (1-10.5 x VSB factor))
		iii. vacuum bagging/closed-mold curing with roll out	EF = 0.126 x %HAP x 2000 x 0.8	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.8
		iv. vacuum bagging/closed-mold curing without roll-out	EF = (0.126 x %HAP x 2000 x 0.5	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.5
	b. atomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000	EF = ((0.714 x %HAP)-0.181) x 2000
		ii. vapor-suppressed resin	EF = 0.169 x %HAP x 2000 x (1-(0.45 x VSB factor))	EF = ((0.714 x %HAP)-0.181) x 2000 x (1-(0.45 x VSB factor))
		iii. vacuum bagging/closed-mold curing with roll-out	EF = 0.169 x %HAP x 2000 x 0.85	EF = ((0.714 x %HAP)-0.181) x 2000 x 0.85
		iv. vacuum bagging/closed-mold curing without roll-out	EF = 0.169 x %HAP x 2000 x 0.55	EF = ((0.714 x %HAP)-0.181) x 2000 x 0.55
	c. nonatomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.107 x %HAP x 2000	EF = ((0.153 x %HAP)-0.0165) x 2000
		ii. vapor-suppressed resin	EF = 0.107 x %HAP x 2000 x (1-(0.45 x VSB factor))	EF = ((0.153 x %HAP)-0.0165) x 2000 x (1-(0.45 x VSB factor))
		iii. closed-mold curing with roll-out	EF = 0.107 x %HAP x 2000 x 0.85	EF = ((0.153 x %HAP)-0.0165) x 2000 x 0.85
		iv. vacuum bagging/closed-mold curing without roll-out	EF = 0.107 x %HAP x 2000 x 0.55	EF = ((0.153 x %HAP)-0.0165) x 2000 x 0.55
	d. atomized mechanical resin application with robotic or automated spray control[2]	nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000 x 0.77	EF = 0.77 x ((0.714 x %HAP)-0.181) x 2000
	e. filament application	i. nonvapor-suppressed resin	EF = 0.189 x %HAP x 2000	EF = ((0.2745 x %HAP)-0.02581 x 2000
		ii. vapor-suppressed resin	EF = 0.12 x %HAP x 2000	EF = ((0.2745 x %HAP)-0.02581 x 2000 x 0.65
	f. atomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2000	EF = ((1.63646 x %HAP)-0.1951) x 2000

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ATTACHMENT A
(continued)

	g. nonatomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.185 x %HAP x 2000	EF = [(0.4506 x %HAP)-0.0505] x 2000	
	h. atomized spray gel coat application using robotic or automated spray	nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2000 x 0.73	EF = [(1.03646 x %HAP)-0.1951] x 2000 x 0.73	
2. Centrifugal casting operations [6]	a. heated air blown through molds	nonvapor-suppressed resin	EF = 0.558 x (%HAP) x 2000	EF = 0.598 x (%HAP) x 2000	
	b. vented molds, but air vented through the molds is not heated	nonvapor-suppressed resin	EF = 0.026 x (%HAP) x 2000	EF = 0.026 x (%HAP) x 2000	

Footnotes to Table 1

1 The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

2 To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

3 Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

4 The VOC factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VOC test method of Appendix A to this subpart.

5 This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

6 Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

7 These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.

8 If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.

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ATTACHMENT B

(for reference purposes only)

Table 3 to Subpart WWWW of Part 63—Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources that Emit Less Than 100 TPY of HAP

As specified in 40 CFR 63.5805, you must meet the following organic HAP emissions limits that apply to you:

If your operation type is . . .	And you use . . .	[1]Your organic HAP emissions limit is . . .
1. open molding—corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding—non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding—tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
4. open molding—low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
5. open molding—shrinkage controlled resins[2]	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding—gel coat[3]	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.
7. centrifugal casting—CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure b. resin application with the mold closed, and the mold is not vented during spinning and cure c. resin application with the mold open, and the mold is vented during spinning and cure d. resin application with the mold open, and the mold is not vented during spinning and cure	25 lb/ton.[4] NA—this is considered to be a closed molding operation. 25 lb/ton.[4] Use the appropriate open molding emission limit.[5]

If your operation type is . . .	And you use . . .	[1]Your organic HAP emissions limit is . . .
8. centrifugal casting—non-CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure	20 lb/ton.[4]
	b. resin application with the mold closed, and mold is not vented during the spinning and cure	NA—this is considered to be a closed molding operation.
	c. resin application with the mold open, and the mold is vented during spinning and cure	20 lb/ton.[4]
	d. resin application with the mold open, and the mold is not vented during spinning and cure	Use the appropriate open molding emission limit.[5]
9. pultrusion[6]	N/A	reduce total organic HAP emissions by at least 60 weight percent.
10. continuous lamination/casting	N/A	reduce total organic HAP emissions by at least 58.5 weight percent or not exceed an organic HAP emissions limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus.

[1] Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

[2] This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

[3] If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

[4] For compliance purposes, calculate your emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 to this subpart, or a site specific emission factor for after the mold is closed as discussed in 40 CFR 63.5796.

[5] Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to this subpart, or a site specific emission factor as discussed in 40 CFR 63.5796.

[6] Pultrusion machines that produce parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more are not subject to this requirement. Their requirement is the work practice of air flow management which is described in Table 4 to this subpart.

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ATTACHMENT C

(for reference purposes only)

40 CFR 63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

(a) *Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.* (1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. If you are using an add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\%\ \text{Control Efficiency}}{100} \qquad \text{(Eq. 1)}$$

Where:

Percent Control Efficiency=a value calculated from organic HAP emissions test measurements made according to the requirements of §63.5850 to this subpart.

(2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

(b) *Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.* Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.

(1)(i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel

coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^{n} Material_i} \quad \text{(Eq. 2)}$$

Where:
Actual Process Stream EF_i=actual organic HAP emissions factor for process stream i, lbs/ton;
$Material_i$=neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;
n=number of process streams where you calculated an organic HAP emissions factor.
(ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.
(2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.
(c) *Demonstrate compliance with a weighted average emission limit.* Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.
(1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of this section.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n}(EL_i * \text{Material}_i)}{\sum_{i=1}^{n}\text{Material}_i} \quad \text{(Eq. 3)}$$

Where:
EL_i=organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;
$Material_i$=neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;
n=number of operations.
(2) Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of this section.

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Operation EF}_i * \text{Material}_i)}{\sum_{i=1}^{n} Material_i} \quad \text{(Eq. 4)}$$

Where:
Actual Individual EF_i=Actual organic HAP emissions factor for operation type i, lbs/ton;
$Material_i$=neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;
n=number of operations.
(3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.
(d) *Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.* This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.
(1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.
(2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.
(3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.
(4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.
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ATTACHMENT D

(for reference purposes only)

Table 4 to Subpart WWWW of Part 63—Work Practice Standards

As specified in 40 CFR 63.5805, you must meet the work practice standards in the following table that apply to you:

For ...	You must ...
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. a new or existing materials HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. an existing or new SMC manufacturing operation	use a nylon containing film to enclose SMC.
6. all mixing or BMC manufacturing operations[1]	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. all mixing or BMC manufacturing operations[1]	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. all mixing or BMC manufacturing operations[1]	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

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For ...	You must ...
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s), ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s), iv. direct any compressed air exhausts away from resin and wet-out area(s), v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.

[1] Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

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