



**STATEMENT OF BASIS FOR FIBER-TECH INDUSTRIES INC
CHAPTER 401 AIR OPERATING PERMIT
AOP-10, RENEWAL #3**

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TABLE OF CONTENTS

TABLE OF CONTENTS 2

LIST OF ABBREVIATIONS..... 3

DEFINITION OF WORDS & PHRASES..... 4

INTRODUCTION 5

FACILITY SUMMARY.....5

PERMITTING HISTORY AND REGULATORY SUMMARY..... 7

GREENHOUSE GAS REQUIREMENTS 8

EXCESS EMISSIONS / EMERGENCY PROVISIONS 10

COMPLIANCE HISTORY 11

EMISSION UNITS..... 11

COMPLIANCE ASSURANCE MONITORING (CAM) 14

INSIGNIFICANT EMISSION UNITS (IEUS) 14

I. STANDARD TERMS & CONDITIONS..... 15

 A. PERMIT ADMINISTRATION..... 16

 B. INSPECTION & ENTRY..... 18

 C. EMERGENCY PROVISIONS 19

 D. GENERAL MONITORING, RECORDKEEPING, & REPORTING 21

 E. COMPLIANCE CERTIFICATION..... 23

 F. TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS & TREATMENT OF
 DOCUMENTS..... 23

 G. APPLICABLE WHEN TRIGGERED REQUIREMENTS.....24

II. EMISSION LIMITATIONS & MONITORING AND REPORTING REQUIREMENTS 25

 A. FACILITY-WIDE EMISSION LIMITATIONS..... 26

 B. GELCOAT & FIBERGLASS LAMINATION EMISSION LIMITATIONS 34

 C. WOOD WORKING / DUST COLLECTION EMISSION LIMITATIONS 41

III . PERMIT SHIELD 50

APPENDIX A - SUMMARY OF MAJOR CHANGES MADE TO PERMIT 53

LIST OF ABBREVIATIONS

BACT	Best available control technology
CFR	Code of Federal Regulations
CO	Carbon monoxide
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NO _x	Oxides of nitrogen
O ₂	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PSD	Prevention of Significant Deterioration
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
SCAPCA	Spokane County Air Pollution Control Authority (on June 3, 2007, SCAPCA was renamed to SRCAA)
SRCAA	Spokane Regional Clean Air Agency (prior to June 3, 2007, agency was called SCAPCA)
scf	Standard cubic foot
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
SO _x	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

DEFINITIONS OF WORDS AND PHRASES

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(13), 02/03/16]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 2/3/16]
Emission Limitation	A requirement established under the FCAA or Chapter 70A.15 RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emissions reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70A.15 (formerly 70.94) RCW [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-030(29), 08/25/18]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70A.15 (formerly 70.94) RCW, or 70A.388 (formerly 70.98) RCW [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-030(31), 08/25/18]
Federal Clean Air Act	Federal Clean Air Act. also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(14), 2/3/16]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-030(61), 08/25/18]
PM Standard	An emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emissions rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

**STATEMENT OF BASIS FOR FIBER-TECH INDUSTRIES INC.
CHAPTER 401 AIR OPERATING PERMIT
AOP-10, RENEWAL #3**

Fiber-Tech Industries Inc. (Fiber-Tech) is a manufacturer of fiberglass-reinforced panels, located in Building #31 of the Spokane Industrial Park, 3808 N Sullivan Road, Spokane, WA. The facility is classified as a major source, as defined in Chapter 173-401 WAC, due to actual emissions of styrene, a hazardous air pollutant (HAP) above the major source threshold of 10 tons per year. The facility is also considered a major source for actual emissions in excess of 25 tons for all HAPs. As a major source, Fiber-Tech is required to apply for an Air Operating Permit (AOP) under SRCAA's Title V air operating permit program as established in Chapter 173-401 WAC. WAC 173-401-700(8) requires that at the time a draft AOP permit is released under the Title V program, a statement be provided setting forth the legal and factual basis for permit conditions, including reference to the applicable statutory or regulatory provisions for the conditions. This document provides the basis for the draft AOP permit for Fiber-Tech. The purpose of the current permitting action is to renew the Title V permit for this facility. SRCAA has not issued any New Source Review permits for this facility and no significant physical changes have been made to the facility since the last Title V Permit was issued.

The permit is organized into sections. The first section contains standard terms and conditions. This section is the same for all permits issued by SRCAA. The second section contains applicable requirements that specifically apply to this facility, along with monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with each applicable requirement. This section is divided into subsections to address different emissions units or classes of emissions units. The third and final section addresses requirements that have been deemed inapplicable to the source or to emissions units located at the source, i.e., the permit shield per WAC 173-401-640(2).

After a brief summary of operations at the facility, the format of this Statement of Basis will follow that of the permit with the standard terms and conditions discussed first, followed by the applicable requirements, and finally, the permit shield.

FACILITY SUMMARY

Fiber-Tech manufactures fiberglass-reinforced panels (FRP) for the trucking, houseboat, and other industries. The facility has the capacity to produce approximately 12,000,000 square feet of FRP panels per year. As part of the process, Fiber-Tech operates a gelcoat operation, fiberglass/resin lamination operation, panel sizing (cutting) operation, and raw material storage area. As a major source of HAPs, Fiber-Tech is subject to the National Emission Standard for Hazardous Air Pollutant: Reinforced Plastic Composites Production, given in 40 CFR 63, Subpart WWWW.

The gelcoat operation at Fiber-Tech begins with a reusable Mylar film, ranging in size from 8-12 feet per side and up to 60 feet long, is placed on a spray table. An automated gelcoat spray gun is attached to a track that causes the gun to traverse the width of the Mylar film. Gelcoat containing from 19-45% styrene is mixed with a catalyst and sprayed onto the Mylar film. The

application of the gelcoat is considered “nonatomized spray gelcoat application” under 40 CFR 63, Subpart WWWW because Fiber-Tech uses impingement style tips that sprays two streams of gelcoat at each other to create a spray fan instead of using spray tips that force the gelcoat through a small orifice. Once the gelcoat is applied, the Mylar film is transferred to a drying table. Styrene emissions from the gelcoat spraying equipment are exhausted through a filtered exhaust stack. Emissions from the gelcoat drying / curing are exhausted through four passive vents located in the wall near the drying tables. After the gelcoat is cured, it is stripped from the Mylar film. The resulting gelcoat layer is used as an outer surface for the FRP. In between gelcoat spray runs, the heads of the spray guns are flushed with styrene. Once every shift, the guns are cleaned using acetone. Fiber-Tech uses approximately 30 drums of gelcoat every week.

The gelcoat layer is then transported to the lamination table where vapor-suppressed resin, containing between 30-46% styrene is applied, then plywood panels are added on top, then more resin applied, and then another gelcoat layer is used to create the FRP. The resin is applied using gravity fed resin troughs or boxes with holes that are re-used several times. The application of the resin is considered “nonatomized mechanical resin application with vapor-suppressed resin” under 40 CFR 63, Subpart WWWW. After the FRP has been assembled, it is cured for 25-60 minutes using one of two portable electric vacuum ovens that exhaust through a resin vacuum pump contained in the compressor shed next to the bulk resin storage building. The vacuum pump evacuates the air from the oven chamber, compresses the gelcoat and wood panel layers together, and cures the resin in the FRP.

The FRP is then transported to the panel sizing area where saws are used to trim the panels to correct dimensions. The saws are routed to one of two baghouses at Fiber-Tech. Saws are also used at the facility to cut plywood that is used in the FRP. These saws are routed to one of two baghouses at the facility.

The main resin used at Fiber-Tech is stored in two 6,000 gallon (each) bulk storage tanks which each store 60,000 pounds of resin. The resin is delivered via tanker truck each week. The resin is pumped from the bulk resin storage tanks (located in a separate building) to shear mixers and then to day tanks. Specialty resins are brought in using 55-gallon drums which are stored in a drum storage area. Gelcoat is brought in using 55-gallon drums which are stored in the same drum storage area.

Annual facility-wide criteria pollutant and HAP emissions from Fiber-Tech reported on the most recent emission inventory form (submitted in 2021, reporting calendar year 2020 emissions) and Potential-to-Emit calculations for the facility are listed in Table 1 below.

Table 1 – Facility-wide Criteria Pollutant and HAP emissions

Pollutant	Actual Emissions – 2020 (tons/yr)	PTE (tons/yr)
PM	0.1 (controlled emissions)	60 (pre-controlled emissions of 30 tpy per baghouse)
VOC	35.9	81.4
Styrene	35.9	81.4

PERMITTING HISTORY & REGULATORY SUMMARY

SRCAA has issued the following Notice of Construction (NOC) approval orders and regulatory orders to Fiber-Tech:

- NOC #714 was approved on December 18, 1995 for installation of a baghouse to collect dust emissions from the sizing trim saw operations.
- NOC #706 was applied for in December 1995, for the gelcoat/resin application process already in place. NOC #706 was approved on September 5, 2001 (Fiber-Tech applied for this NOC as part of their Air Operation Permit application. NOC #706 was revised on March 22, 2007 to remove language related to the Assurance of Discontinuance and Compliance Plan because requirements had all been met. NOC #706 was revised again on July 26, 2007 to increase VOC and styrene emission limits and update permit to current language and agency name change. NOC #706 was again revised on December 8, 2010 to remove Condition 15.d from the conditions of approval.
- NOC #991 was approved November 17, 1999, for the installation of Torit & Day, Donaldson Company, Inc. baghouse (model 49PJD10) in Building #25. This NOC has been voided because the equipment was removed from Building #25.
- Assurance of Discontinuance (AOD) and Compliance Plan (CP) issued 3/30/01 for Gelcoat and Resin Coating Operations. The AOD and CP are no longer in effect because Fiber-Tech has met all of the requirements.
- NOC #1404 issued on October 3, 2007 for installation of a panel sizing / trim saw and Torit Model 49PJD10 baghouse. NOC #1404 was revised on June 5, 2015 to install four saws (1 plywood saw, 1 table saw, and 2 Roger saws) and increase the baghouse fan size to 7,092 SCFM. NOC #1404 was again revised on November 15, 2019 to remove the plywood saw and replace it with a sigma beam saw.

The facility is subject to the National Emission Standard for Hazardous Air Pollutant: Reinforced Plastic Composites Production, given in 40 CFR 63, Subpart WWWW, issued by EPA on 4/21/03. Subpart WWWW was revised by EPA on 8/25/05 through a direct final rule to revise compliance options for open molding, correct errors, and add clarification to sections of the rule.

Subpart WWWW was revised again on 3/20/20 to finalize the residual risk and technology review (RTR) and to address emissions during periods of startup, shutdown, and malfunction (SSM) and amend provisions regarding electronic reporting of performance test and performance evaluation results and semiannual reports. SRCAA has adopted the most recently revised version of Subpart WWWW by reference into SRCAA Regulation I, Section 2.18(A).

SRCAA has issued the following Air Operating Permits (AOP) to Fiber-Tech:

- AOP-10 was issued to Fiber-Tech on January 30, 2003;
- AOP-10 was revised on September 27, 2004 to incorporate the Subpart WWWW requirements;
- AOP-10, Renewal #1 was issued on February 22, 2008.
- AOP-10, Renewal #2 was issued on April 29, 2013.

GREENHOUSE GAS REQUIREMENTS

Chapter 173-441 WAC – State GHG reporting requirements

On December 1, 2010, Ecology promulgated a regulation, Chapter 173-441 WAC, for state reporting of greenhouse gas (GHG) emissions. Chapter 173-441 WAC establishes GHG reporting requirements that apply to owners and operators of certain facilities that directly emit GHG in Washington. The rule applies to any facility that emits 10,000 metric tons carbon dioxide equivalent (CO₂e) or more per calendar year in total GHG emissions. In 2015, Ecology amended chapter 173-441 WAC, in order to maintain consistency with EPA's greenhouse gas reporting program. The amendments included revising the global warming potentials in WAC 173-441-040, updating calculation and monitoring methods, and minor streamlining revisions to reporting requirements. In 2016, Ecology further amended Chapter 173-441 WAC, in order to have terminology consistent with Chapter 173-442 WAC – Clean Air Rule.

For an existing facility that began operation before January 1, 2012, GHG emissions must be reported to Ecology for calendar year 2012 and each subsequent calendar year. The report is due by March 31st of each calendar year for GHG emissions in the previous calendar year if a person is also required to report GHG emission to EPA under 40 CFR Part 98. The report is due by October 31st of each calendar year for GHG emissions in the previous calendar year if a person is not required to report GHG emissions to EPA under 40 CFR Part 98.

The state greenhouse gas (GHG) reporting requirements, given in Chapter 173-441 WAC, were added to the revised air operating permit as Condition I.G.6. This condition was added to the "Applicable When Triggered Requirements" section of the permit. The requirements will only apply if Fiber-Tech has high enough GHG emissions to require reporting to Ecology, as required in Chapter 173-441 WAC.

In addition to the state GHG reporting requirements, EPA has also promulgated some additional GHG rules, namely the "tailoring rule," which sets thresholds for GHG emissions that define when permits under the PSD program and Title V program are required for new and existing facilities, and the federal GHG reporting rules.

40 CFR Part 98 - Federal GHG reporting requirements

On October 30, 2009, EPA promulgated regulations for mandatory federal GHG reporting in 40 CFR Part 98. The rule has been amended a number of times, most recently on December 9, 2016. In general, the regulations require that facilities that emit 25,000 metric tons of CO₂e must report their GHG emissions to EPA.

The federal GHG reporting requirements given in 40 CFR Part 98 are not considered “applicable requirements,” as defined in 40 CFR 70.2, under the title V operating permit program. Therefore, inclusion of the federal GHG reporting requirements in 40 CFR Part 98 is not required for the Title V permit.

40 CFR Parts 51, 52, 70, and 71 - “Tailoring Rule”

On May 13, 2010, EPA issued a final rule that “tailors” the applicability criteria given in 40 CFR Parts 51, 52, 70, and 71 that determine which stationary sources and modification projects become subject to permitting requirements for GHG emissions under the PSD and Title V programs of the Clean Air Act. Per the 2010 version of the tailoring rule, on and after July 1, 2011, any existing or new source with the potential to emit more than 100,000 tpy CO₂e needed a Title V permit. Additionally, for PSD, permitting requirements were triggered if the project was expected to increase GHG emissions by more than 75,000 tpy CO₂e.

On June 23, 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA*, 134 S. Ct. 2427 (2014) (“UARG”). The Court held that EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology (BACT).

On April 10, 2015, in accordance with the Supreme Court decision, the D.C. Circuit issued an amended judgment in *Coalition for Responsible Regulation, Inc. v. EPA*, Nos. 09-1322, 10-073, 10-1092 and 10-1167 (D.C. Cir. April 10, 2015), which, among other things, vacated the PSD and title V regulations under review in that case to the extent that they require a stationary source to obtain a PSD or title V permit solely because the source emits or has the potential to emit GHGs above the applicable major source thresholds. The D.C. Circuit also directed EPA to consider whether any further revisions to its regulations are appropriate in light of UARG, and if so, to undertake to make such revisions.

On April 30, 2015, in response to the court decision, EPA issued a direct final rule to narrowly amend the permit rescission provisions in the PSD regulations. This action allows the rescission of Clean Air Act PSD permits that issued by the EPA or delegated state and local permitting authorities on the sole basis of a source’s GHG emissions.

In order to meet the requirements of the tailoring rule, Fiber-Tech submitted a PTE analysis for CO₂e based on a global warming potential for Methyl Methacrylate (MMA). This was done because the worst case pollutant at the facility in terms of atmospheric life is MMA. The facility

did not provide new estimates for CO₂e from natural gas. However natural gas usage at the facility is limited to insignificant emissions units used for climate control. Therefore, SRCAA will use the previous PTE analysis.

Facility-wide PTE GHG Emissions

	CO ₂ e Emissions (tons/yr)	CO ₂ e Emissions (metric tons/yr)
Process Emissions	282.5	256.3
Natural Gas Emissions	310.4	281.6
Total Emissions	592.9	537.9

SRCAA is meeting the requirements of the tailoring rule by incorporating the applicable state GHG reporting requirements from Chapter 173-441 WAC into this Title V permit into the “Applicable When Triggered Requirements” which requires Fiber-Tech to report emissions if they ever reach the threshold (10,000 metric tons CO₂e per year). In addition, the permit incorporates the newly revised version of Chapter 173-400 WAC, which adopted the tailoring rule new source review thresholds on a state level. The newly revised version of Chapter 173-400 WAC adopted by reference the subparts of 40 CFR 52.21, in effect on January 1, 2016, into WAC 173-400-720, “Prevention of significant deterioration (PSD),” which includes the tailoring rule new source review thresholds. The revised permit requires that Fiber-Tech meet the requirements given in the newly revised version of Chapter 173-400 WAC for any new source review project that might occur (Condition I.G.1). This condition will ensure that Fiber-Tech must obtain a PSD permit and meet BACT for any future project that causes an increase of GHG emissions above the thresholds established in the tailoring rule.

EXCESS EMISSION / EMERGENCY PROVISIONS

On 5/22/15, Ecology received a SIP call from EPA regarding the Excess Emissions provisions given in WAC 173-400-107, specifically the treatment of excess emissions during periods of startup, shutdown, and malfunction (SSM). To address the SIP call, Ecology completed rulemaking with revised requirements given in WAC 173-400-081, titled “Emission limits during startup and shutdown” and a new section in WAC 173-400-082, titled “Alternative emission limit that exceeds an emission standard in the SIP” (filed on 8/16/18) that will be submitted to EPA for inclusion into Washington’s SIP. Until the SIP is revised to include WAC 173-400-081 and -082, WAC 173-400-107 (version in effect on September 20, 1993) remains in effect. After the effective date of EPA’s removal of the September 20, 1993 version of WAC 173-400-107 from the SIP, it will no longer be effective. Ecology also retained two state-only sections, (not federally enforceable), given in WAC 173-400-108 and 173-400-109, pertaining to unavoidable excess emissions that will take effect on the effective date of EPA’s removal of the September 20, 1993 version of WAC 173-400-107 from the SIP. The renewal permit includes the requirements from WAC 173-400-107, along with the requirements from WAC 173-400-108 and -109, which will become state/local only requirements when WAC 173-400-107 is no longer effective. The requirements of WAC 173-081 and -082 are not specifically listed as applicable requirements in the renewal permit because neither section currently apply to Fiber-Tech. If either section became applicable to Fiber-Tech, it would be part of a new source review, regulatory order, or rulemaking action.

COMPLIANCE HISTORY

SRCAA has performed a compliance inspection at Fiber-Tech either annually or biannually since 1996. The most recent inspection was performed on September 30, 2021. Since the last renewal SRCAA has issued 5 NOV's which are listed below:

On May 19, 2021, SRCAA issued Notice of Violation (NOV) 2021-BD-002-N to Fiber-Tech for failure to comply with particulate matter / fugitive dust requirements and pressure drop requirements associated with the baghouse and parking lot areas. SRCAA assessed a penalty of \$15,500, which was paid on September 16, 2021.

On January 16, 2020, SRCAA issued Notice of Violation (NOV) 2020-BD-002-N to Fiber-Tech for failure to comply with the requirement to store all VOC, HAP, and TAP containing material in closed containers, clean up all spills of VOC and TAP containing materials upon discovery, and to cover mixers with not visible gaps. SRCAA assessed a penalty of \$9,500, of which \$4,500 was suspended and \$5,000 was paid September 17, 2020.

On May 3, 2019, SRCAA Issued NOV #8070 to Fiber-Tech for failure to comply with requirements to store all VOC, HAP, and TAP containing material in closed containers, clean up all spills of VOC and TAP containing materials upon discovery, maintain the baghouse in good operating condition, maintain records of maintenance done on the baghouse, and to minimize fugitive particulate emissions from the building and baghouse by keeping load out area and roadway free of fugitive dust. SRCAA assessed a penalty of \$20,000, of which, \$5,000 was suspended and \$15,000 was paid December 5, 2019.

On April 9, 2019, SRCAA issued NOV #8453 to Fiber-Tech for failure to comply with emissions limitations for particulate matter, clean up all spilled particulate matter upon discovery, and not reporting the failure of a control device within 24 hours. SRCAA assessed a penalty of \$13,000, of which, \$4,000 was suspended and \$9,000 was paid October 14, 2020.

On November 21, 2016, SRCAA issued NOV #8247 to Fiber-Tech for failure to comply with semiannual reporting requirements and to maintain the baghouse in good operating condition. SRCAA assessed a penalty of \$1,500 that was paid on 2/14/2017.

It should be noted that the requirements from the 1999 NOV (issued for failure to get an approved Notice of Construction and meet BACT for the facility), which included an Assurance of Discontinuance (AOD) and Compliance Plan (CP) have been met.

EMISSION UNITS

Significant emission units at Fiber-Tech can be divided into two main categories: Gel Coat Process & Fiberglass Lamination Operation sources and Wood Working/Dust Collection sources. A section on each of these categories follows. At the end of this section, the insignificant emission units at Fiber-Tech are discussed and listed.

Gel Coat Process & Fiberglass Lamination Operation Sources

To manufacture the fiberglass reinforced panels, the two major processes are the gel coat process and fiberglass lamination operation. In the gel coat process, gel coat is applied to a carrier film and allowed to cure. The gel coat material contains styrene, and may contain methylmethacrylate (MMA), which are emitted during the process.

The gel coat application operation is a non-atomized spraying process. The gel coat application process is as follows:

1. A reusable rolled Mylar film is placed at the front of the line.
2. Gel coat is mixed with a catalyst, methyl ethyl ketone peroxide, (MEKP) to initiate cross-linking of the gel coat and is sprayed with a spray gun fitted with impingement tips on to the Mylar film to each customer's specifications.
3. A filtered overspray collection hood collects VOC and styrene emissions and exhausts 40 feet above the ground through a 16" x 24" exhaust stack, using two fans that total 8,080 cfm (4,040 cfm ea.). The gel coat collection hood includes a fiberglass filtration system to collect particulate overspray.
4. After the gel coat covered Mylar film is pulled the complete length of the table, it is manually moved to a curing table. Fugitive VOC and styrene emissions occur during the curing process. Four fans (4,000 cfm ea.), located on the north side of the building, collect fugitive emissions from the curing process and exhaust through four horizontal wall 27" x 27" vents.
5. After the gel coat is cured, it is stripped from the Mylar film. The Mylar film is reused. The resulting gel coat layer is used as an outer surface for Fiber-Tech's fiberglass reinforced plywood panels.

The fiberglass-reinforced panels are produced by bonding the gel coat to the core material, using polyester resin, reinforced with preformed glass. This process is called the fiberglass lamination operation and is carried out on one of four lamination tables. Emissions from the fiberglass lamination operation consist of fugitive VOC and styrene emissions. The lamination process is as follows:

1. The gel coat is transported to the lamination table, where it is smoothed out to ensure that no wrinkles will develop during the process.
3. A fiber reinforced resin surface is created, using steps that are considered proprietary by Fiber-Tech.
4. A large plywood panel, usually 8 feet wide and up to 60 feet long, consisting of 4' x 8' panels that have been stapled together, is then transported by a small hoist to the lamination table, where, it is placed on top of the resin.
5. In most panels, the above procedure is repeated in reverse order, resulting in a "sandwich," consisting of gel coat, fiber reinforced resin surface, gel coat.
6. After the sandwich is formed, it is covered with an electrically heated vacuum bag that is transported to the lamination table and lowered onto the table.

7. A vacuum pump, which vents and is exhausted through the vacuum pump room, evacuates the air from the bag, and in the process compresses the layers together, which distributes the resin throughout the layers.
8. After the air is evacuated, the oven temperature is brought up to the required temperature (about 125°F), and the resin in the panel is cured.
9. The cured panel is then moved to the panel sizing area.

Significant Gel Coat Application Process & Fiberglass Lamination Operation emission units are listed in Table 2 below. If a unit was subject to new source review requirements, the NOC approval number is given in parentheses after the unit description.

Table 2 – Gel Coat Process & Fiberglass Lamination Operation Emission Units

Emission Unit Number Used in Permit Application (Process # - Discharge #)	Description	Air Pollution Control Equipment
#1-2 – 2	<p>Gel Coat Application and Curing Processes (NOC #706)</p> <p>Gel Coat curing emissions are uncontrolled and exhausted via a system of 4 vents on the north side of Bldg. #31.</p>	<p>A filtered collection hood collects emissions from the gel coat application process and exhausts through a filtered stack.</p>
#1-3 - 3	<p>Fiberglass Resin Lamination Operation (resin application and curing) (NOC #706)</p> <p>A resin vacuum pump in the resin storage building pumps emission out through a horizontal stack on the east side of resin storage building. A singular vacuum pump backs up the resin vacuum pump and exhausts inside the resin storage building.</p>	<p>Uncontrolled; no air pollution control equipment.</p>

Wood Working/Dust Collection Sources

After the fiberglass panel has been cured, it is then cut to the customer-specified size using various saws. In addition, Fiber-Tech also operates saws to cut and trim the core material, which generally is plywood. The sawdust generated from the saws in Bldg. #31 is exhausted through one of two baghouses, located outside of Bldg. #31.

Significant Wood Working/Dust Collection Emissions Units/Activities are listed in Table 3 below. If a unit was subject to new source review requirements, the NOC approval number is given in parentheses after the unit description.

Table 3 – Wood Working/Dust Collection Emissions Units

Emission Unit Number Used in Permit Application (Process # - Discharge #)	Description	Air Pollution Control Equipment
#1-4 – 4A	Trim / Sizing, Leroy saw in Bldg. #31	Torit Model 49PJD10 baghouse on south side of Bldg. #31 (6,000 scfm) – NOC #714
#1-4 – 4B	Panel Sizing / Trim, Table saw, 2 Rodgers saws, Sigma Beam saw in Bldg. #31	Torit Model 49PJD10 baghouse (7,092 scfm) – NOC #1404

Compliance Assurance Monitoring (CAM)

The requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM), apply to pollutant-specific emissions units (PSEU) at a major source that is required to obtain a Part 70 permit if the unit satisfies all of the following criteria:

1. The PSEU must have pre-controlled emissions of the applicable pollutant which exceeds the major source thresholds established in WAC 173-401-200(17).
2. The PSEU must utilize air pollution control equipment to reduce emissions of the applicable pollutant to a level that meets the established emission limit(s).
3. The PSEU must be subject to an emission limit for the applicable pollutant.

The only emission units at Fiber-Tech that utilize air pollution control equipment are the two baghouses associated with the wood working operations. The two baghouses at Fiber-Tech are not subject to the requirements given in 40 CFR Part 64, “Compliance Assurance Monitoring” (CAM) because the pre-controlled emissions entering each baghouse are below major source thresholds. In order for the CAM requirements to apply, the pre-controlled emissions for the emissions unit must be above major source thresholds (and the emissions unit must employ an

add-on air pollution control device and the emission unit must be subject to an emissions limit for the pre-controlled major pollutant(s). Per Fiber-Tech’s renewal AOP application, the pre-controlled PM10 emissions for each baghouse are 30 tons/year, which is below the major source threshold of 100 tons/year. Therefore, the CAM requirements given in 40 CFR 64 are not applicable to the baghouses at Fiber-Tech.

Insignificant Emission Units

Insignificant emission units (IEUs) include any activity or emission unit located at a major source which qualifies as insignificant under the criteria listed in WAC 173-401-530. A list the IEUs identified in the permit application is presented below in Table 4.

Insignificant emission units are subject to the generally applicable requirements (i.e., facility-wide emission limitations). According to WAC 173-401-530, testing, monitoring, recordkeeping, and reporting are not required for insignificant emission units unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirement of the state implementation plan. SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units presented in Table 4 to assure compliance with the generally applicable requirements. SRCAA’s determination was based on the following:

- SRCAA has not documented a violation of any of the generally applicable requirements in the past from the list of IEUs in Table 4 (i.e., the IEUs have had a consistent compliance history); and
- The IEUs emit small quantities of pollutants and are not directly vented (i.e., do not have an exhaust stack).

Table 4 – Insignificant Emissions Units

Emissions Unit Description	Basis / Justification for IEU Designation
Ambient Air Heating Units (12 – each under 400,000 BTU/hr each)	WAC 173-401-533(2)(e)
Methyl Ethyl Ketone usage	WAC 173-401-531(2)
Storage Tanks / Use Tanks	WAC 173-401-533(b)
(2) 6,000-Gallon (60,000 pound) Resin Storage Tanks	WAC 173-401-531(1)
Drum storage room ventilation (1,000 cfm) and resin mixer room ventilation (400 cfm)	WAC 173-401-532(9)

I. STANDARD TERMS AND CONDITIONS

This section of Fiber-Tech's permit contains standard terms and conditions that apply to all sources in SRCAA's Title V program. These conditions have been reviewed by EPA and include all terms required in Chapter 173-401 WAC as well as requirements from other air quality laws and regulations. The standard terms have been organized in seven subsections including:

PERMIT ADMINISTRATION;
INSPECTION & ENTRY;
EMERGENCY PROVISIONS
GENERAL MONITORING, RECORDKEEPING, & REPORTING;
COMPLIANCE CERTIFICATION;
TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS AND TREATMENT
OF DOCUMENTS; and
APPLICABLE WHEN TRIGGERED REQUIREMENTS.

A discussion of each subsection follows. The requirements in each section are briefly discussed, along with the citations for each requirement. Using the same methodology as the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA. Although, in and of itself, Chapter 173-401 WAC is not federally enforceable, the requirements of this regulation are based on federal requirements for the operating permit program. Upon issuance of the permit, the terms based on Chapter 173-401 WAC will become federally enforceable for the source.

A. Permit Administration

Below are standard terms included in the subsection, Permit Administration. Generally, the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirement.

- I.A.1. Federal Enforceability - All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. [WAC 173-401-625, 10/4/93]
- I.A.2. Duty to Comply – The permittee must comply with the terms and conditions of the permit. [WAC 173-401-620(2)(a), 10/4/93]
- I.A.3. Schedule of Compliance – The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis. [WAC 173-401-630(3), 2/3/16]
- I.A.4. Need to Halt or Reduce Activity Not a Defense – The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action. [WAC 173-401-620(2)(b), 10/4/93]
- I.A.5. Permit Actions - This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If Fiber-Tech files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance. [WAC 173-401-

620(2)(c), 10/4/93]

- I.A.6. Reopening for Cause - This term lists instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements. [WAC 173-401-730, 10/4/93]
- I.A.7. Emissions Trading - No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [WAC 173-401-620(2)(g), 10/4/93]
- I.A.8. Property Rights - The permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/93]
- I.A.9. Duty to Provide Information – The permittee must furnish, within a reasonable time to SRCAA, any information, including records required in the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. [WAC 173-401-620(2)(e), 10/4/93]
- I.A.10. Duty to Supplement or Correct Application – The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, must promptly submit such supplementary facts or corrected information. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit. [WAC 173-401-500(6), 9/16/02]
- I.A.11. Permit Fees – The permittee must pay fees as a condition of this permit in accordance with SRCAA's fee schedule. Failure to pay fees in a timely fashion will subject the permittee to civil and criminal penalties, as prescribed in Chapter 70A.15 70.94 RCW. [WAC 173-401-620(2)(f), 10/4/93]
- I.A.12. Severability - If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable. [WAC 173-401-620(2)(h), 10/4/93]
- I.A.13. Permit Appeals - The permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on SRCAA within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA, including petitions filed pursuant to 40 CFR 70.8(c) and 70.8(d). [WAC 173-401-620(2)(i), 10/4/93] [WAC 173-401-735(1), 4/2/97]
- I.A.14. Permit Renewal and Expiration - The permit is in effect for five years. The permittee's right to operate this source terminates with the expiration of the permit unless a timely and complete application for renewal is submitted. Chapter 173-401-710(1) allows SRCAA to set, in the permit, the due date for the renewal as long as it is no more than 18 months and no less than six months prior to expiration of the permit. SRCAA specifies in the permit that the renewal must be submitted no more than 18 months and less than 12 months prior to the permit expiration. The facility may continue to operate,

subject to final action by SRCAA on the application, as long as a timely and complete application has been filed, and all requested additional information necessary to process the permit is submitted, prior to the written deadline specified by SRCAA. [WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1) & (3), 9/16/02]

- I.A.15. Permit Continuation - The permit will not expire until the renewal permit has been issued or denied, if a timely and complete application has been submitted. [WAC 173-401-620(2)(j), 10/4/93]
- I.A.16. Permit Shield. Compliance with a permit condition is deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance, provided such applicable requirements are included and are specifically identified in the permit. This provision does not apply to any insignificant emissions units or activities designated under WAC 173-401-530. This permit shield shall not alter or affect the following:
- a. The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The ability of EPA to obtain information from the permittee pursuant to Section 114 of the FCAA;
 - d. The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA;
 - e. The ability of SRCAA to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993.
- [WAC 173-401-640(1) & (4), 10/4/93]

B. Inspection and Entry

Below are standard terms included in the subsection, Inspection & Entry. This subsection of the permit contains requirements for allowing authorized access to a facility for purposes of assuring/determining compliance with air quality requirements. Generally the language tracks the rule language closely with only minor changes for clarity and conciseness. There is no intent to alter the effect of the requirements.

- I.B.1. Inspection and Entry - No person shall obstruct, hamper, or interfere with any authorized representative of SRCAA who requests entry for the purpose of inspection, and who presents appropriate credential; nor shall any person obstruct, hamper or interfere with any such inspection. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow SRCAA, or an authorized representative, to perform the following:
- a. Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the

conditions of this permit;

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- d. As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

[WAC 173-401-630(2), 2/3/16] [RCW 70A.15.2500 (formerly 70.94.200), 1998 – STATE /LOCAL ONLY] [SRCAA Regulation I, Article II, Section 2.02.E & F, 7/9/20 - STATE/LOCAL ONLY] [NOC #706, Condition 16, 9/5/01 as revised on 12/8/10] [NOC #1404, Condition 11, 10/2/07 as revised on 11/15/19]

Nothing in this condition limits the ability of EPA to inspect or enter the premises of the permittee under Section 114 of the FCAA. [WAC 173-401-640(4)(d), 10/4/93]

C. Emergency Provisions

Below are standard terms that are included in the subsection, Emergency Provisions. This subsection of the permit contains provisions, governing the treatment of periods of emissions in excess of applicable standards, when such emissions stem from unforeseeable events or arise from start-up, shutdown or maintenance, where design or operational practices could not preclude such emissions. Generally, the language closely tracks the rule language, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

- I.C.1. Emergencies - This term incorporates the emergency provisions established in Chapter 173-401 WAC, which allow for a positive defense to noncompliance with technology-based emissions limitations, if certain conditions are met. [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]
- I.C.2. Excess Emissions (prior to removal of WAC 173-400-107 from SIP). If excess emissions due to startup or shutdown conditions, scheduled maintenance, or malfunctions / upsets are determined to be unavoidable under the procedures and criteria in WAC 173-400-107, such emissions are violations of the applicable statute, regulation, permit, or regulatory order but are not subject to penalty. The permittee shall submit a notification of the excess emissions in accordance with I.D.7-Prompt Reporting of Deviations below, and submits a full written report, including the information required in WAC 173-400-107. After the removal of WAC 173-400-107 from the SIP, this condition is no longer in effect. [(SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-107 (9/20/93)] [WAC 173-401-615(3)(b), 9/16/02]
- I.C.3. Excess Emissions (after removal of WAC 173-400-107 from SIP). After the removal of WAC 173-400-107 from the Washington state SIP, if excess emissions due to an upset

or malfunction are determined to be unavoidable under the procedures and criteria in WAC 173-400-109, such emissions are violations of the applicable statute, regulation, permit, or regulatory order but are not subject to penalty. Excess emissions that occur due to an upset or malfunction during a startup or shutdown event are treated as an upset or malfunction under this condition. The permittee shall submit a notification of the excess emissions in accordance with Condition I.D.7-Prompt Reporting of Deviations below, and submit a full written report including information required under WAC 173-400-109(5) supporting the claim that the excess emissions were unavoidable.

This condition does not apply to an exceedance of an emission standard in 40 C.F.R. Parts 60, 61, 62, 63, and 72, or SRCAA's adoption by reference of these federal standards.

Note: Nothing in a state rule limits a federal court's jurisdiction or discretion to determine the appropriate remedy in an enforcement action.

[SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-108 and -109 (8/16/18)] – STATE/LOCAL ONLY [WAC 173-401-615(3)(b), 9/16/02]

- I.C.4. Report of Breakdown for State/Local Only Requirements in SRCAA Regulation I. If pollutants are emitted in excess of any limit established by Ecology or SRCAA in any order(s), rule(s) or regulation(s) that apply to the facility as a direct result of unavoidable upset conditions or unavoidable and unforeseeable breakdown of equipment or control apparatus, the permittee may be exempt from penalties if the permittee submits a notification of the breakdown in accordance with Condition I.D.7-Prompt Reporting of Deviations below and upon request by SRCAA's control officer, submits a report giving the causes, the steps to be taken to repair the breakdown and a time schedule for the completion of the repairs. In order to prove to the control officer that the excess emissions due to breakdown were unavoidable, the permittee must adequately demonstrate that:
- a. The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
 - b. The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and
 - c. The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emissions unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

The control officer, upon receipt of a report from the permittee describing a breakdown,

may:

a. Allow operation exempt from penalties, but only for a limited time period, after which the permittee will be required to comply with SRCAA Regulation I or be subject to the penalties in SRCAA Regulation I, Section 2.11. Such an exemption may be withdrawn if the exempt operation becomes a cause of complaints; or

b. Require that the permittee curtail or cease operations until repairs are completed if the quantity of pollutants or the nature of the pollutants could cause damage.

Note: This provision does not provide relief against federally enforceable applicable requirements.

[SRCAA Regulation I, Section 6.08, 7/9/20 - STATE/LOCAL ONLY]

D. General Monitoring, Recordkeeping, & Reporting

Below are standard terms included in the subsection, General Monitoring, Recordkeeping, & Reporting. This subsection contains general requirements for monitoring, recordkeeping, and reporting. Monitoring, recordkeeping, & reporting requirements (MRRR) that apply to specific emission standards or specific emission activities are located in the second section of the permit. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the Monitoring Reports term, attempts have been made to clarify SRCAA's expectation of how the requirements will be met. The discussions below provide more detail on these efforts and the regulatory authority relied upon to establish the terms.

I.D.1. Records of Required Monitoring Information - This term details what records must be kept relating to monitoring. [WAC 173-401-615(2)(a), 9/16/02]

I.D.2. Permanent Shutdown of an Emissions Unit - If an emissions unit is permanently shut down, rendering existing permit terms and conditions irrelevant, the permittee will not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emissions unit, once any residual requirements, such as the semi-annual report and annual compliance certification covering the last period during which the unit last operated, have been met. All records, relating to the shut down emissions unit, generated while the emissions unit was in operation, must be kept in accordance with Conditions I.D.1 - Records of Required Monitoring Information and I.D.5 – Retention of Records

Contemporaneous with the shutdown of the emissions unit, the permittee must record the date that operation of the emissions unit ceased, using a log or file on site. The - shutdown date must be reported to SRCAA on the monitoring report, required under Condition I.D.6 - Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

- I.D.3. Operational Flexibility - In the event that an emissions unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why, and lengths of time that the emissions unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]
- I.D.4. Records of Changes – The permittee must keep records of changes made at the source that result in emissions of a regulated air pollutant, subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from such a change. [WAC 173-401-615(2)(b), 9/16/02]
- I.D.5. Retention of Records – The permittee must keep monitoring data and support information for a period of five years. Records may be kept in electronic format, however, originals of support information, generated in hardcopy format, must be kept for the required five years. [WAC 173-401-615(2)(c), 9/16/02]
- I.D.6. Monitoring Reports – The permittee must submit monitoring reports to SRCAA as follows:
- Monitoring report covering the period from January 1 – June 30 each year shall be submitted to SRCAA and postmarked no later than July 30 of the same calendar year; and
 - Monitoring report covering the period from July 1 – December 31 each year shall be submitted to SRCAA and postmarked no later than April 15 of the following calendar year.

All instances of permit deviations must be identified in the monitoring reports. In addition, any permanent emission unit shutdowns must be reported in accordance with Condition I.D.2.-Permanent Shutdown of an Emission Unit, above. The monitoring reports must be certified by a responsible official. SRCAA has added language to this condition that if monitoring reports are required, by an underlying requirement, to be submitted more frequently than every six months, the responsible official certification is only required for the semiannual reports but that the certification must cover all reports submitted since the last certification. The addition of this last requirement meets the intent of the law in that all reports are certified, while minimizing the burden on a source to go to the responsible official every time a report is submitted. Allowing a source this flexibility could become more important in the future, e.g., if SRCAA were to require a source to submit monitoring data electronically or by some other real time mechanism where responsible official certification would be difficult, if not impossible. [WAC 173-401-615(3)(a), 9/16/02]

- I.D.7. Prompt Reporting of Deviations - Fiber-Tech must promptly report deviations from permit requirements, the probable cause of such deviations, and any corrective measures taken. (Prompt is defined in this permit term). [Streamlined condition for the notification requirements in: WAC 173-401-615(3)(b), 9/16/02; WAC 173-401-645(3)(d), 10/4/93; (SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-107 (9/20/93), SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by

reference WAC 173-400-108 (8/16/18) – STATE/LOCAL ONLY; WAC 173-400-107(3), 3/1/11; SRCAA Regulation I, Section 6.08.A.1, 7/9/20 – STATE/LOCAL ONLY

- I.D.8. Emissions Inventory - Fiber-Tech must submit an inventory of emissions from the source each year and must maintain records sufficient to document reported emissions. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-105 (10/25/18)]
- I.D.9. WAC 173-401-530(1)(a) Insignificant Emissions Units - Emissions from emissions units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels. Upon request from SRCAA, Fiber-Tech must demonstrate that the actual emissions from such a unit or activity are below the applicable emissions thresholds. [WAC 173-401-530(6), 9/16/02]
- I.D.10. Report Submittals - This term provides the address to which reports must be sent and requires a responsible Fiber-Tech official to certify all reports are truthful, accurate, and complete. [WAC 173-401-520, 10/4/93]
- I.D.11. Rendering Device or Method Inaccurate - Fiber-Tech may not render inaccurate any monitoring device or method required under Chapter 70A.15 (formerly 70.94) or 70A.25 (formerly 70.120) RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [SRCAA Regulation I, Section 2.08(F), 7/9/20]

E. Compliance Certification

As part of SRCAA's Title V program, sources are required to submit annual compliance certifications. (SRCAA may require more frequent certifications, if the source is out of compliance or, if an underlying requirement specifies more frequent submittals.) This subsection of the permit addresses the details of these compliance certification submittals including, how often submittals must occur, what the submittals must contain, and to whom the certifications must be sent. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

- I.E.1. Compliance Certification Submittals - This term covers the frequency for submitting compliance certifications. [WAC 173-401-630(5)(a), 2/3/16]
- I.E.2. Compliance Certification Contents - This term describes what must be included in each compliance certification. [WAC 173-401-630(5)(c), 2/3/16]
- I.E.3. Credible Evidence - For the purpose of submitting compliance certifications or establishing violations of any standard approved in the SIP, the permittee shall not preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 52.12, 2/24/97] [40 CFR 52.33, 2/24/97]
- I.E.4. Submittal to EPA - This term requires that certifications be sent to EPA as well as SRCAA. [WAC 173-401-630(5)(d), 2/3/16]

F. Truth and Accuracy of Statements and Documents and Treatment of Documents

Below are standard terms contained in the subsection, Truth and Accuracy of Statements and Documents and Treatment of Documents. The terms are based on SRCAA's Regulation I. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

- I.F.1. False Information - Fiber-Tech may not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70A.15 (formerly 70.94) or 70A.25 (formerly 70.120) RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [SRCAA Regulation I, 2.08.A & 2.08.E, 7/9/20 - STATE/LOCAL ONLY]
- I.F.2. Alteration of Documents - This term prohibits Fiber-Tech from reproducing or altering any document issued by SRCAA, if the purpose of such is to evade or violate any requirement. [SRCAA Regulation I, 2.08.B, 7/9/20- STATE/LOCAL ONLY]
- I.F.3. Availability of Documents - Any order required to be obtained by SRCAA Regulation I must be available on the premises designated on the order. [SRCAA Regulation I, 2.08.C, 7/9/20 - STATE/LOCAL ONLY]
- I.F.4. Posting of Notices - Notices which SRCAA requires to be displayed shall be posted. Fiber-Tech may not mutilate, obstruct, or remove any notice, unless authorized to do so by the SRCAA [SRCAA Regulation I, 2.08.D, 7/9/20 - STATE/LOCAL ONLY]

G. Applicable When Triggered Requirements

The subsection, Applicable When Triggered Requirements, contains requirements that do not apply to the facility unless certain activities at the site trigger the requirement. SRCAA has included these requirements in the permit, either because they are often triggered at sources or are important enough that their inclusion in the permit is warranted. Generally, the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

- I.G.1. New Source Review - Prior to the establishment of a new source, including modifications, the permittee may be required to file for and obtain approval under SRCAA's Notice of Construction program. [Chapter 173-400 WAC, 9/20/93] [SRCAA Regulation I, Section 2.14(A)(8), 7/9/20, which adopts by reference Chapter 173-460 WAC (11/22/19)] [SRCAA Regulation I, Article V, 7/9/20 – portions of which are STATE/LOCAL ONLY]
- I.G.2. Replacement or Substantial Alteration of Existing Control Equipment - Prior to replacing or substantially altering existing control equipment, the permittee shall file for and obtain approval under SRCAA's Notice of Construction program. [SRCAA Regulation I, Section 2.14(A), 7/9/20, which adopts by reference WAC 173-400-114 (11/28/12)] [SRCAA Regulation I, Article V, 7/9/20 - STATE/LOCAL ONLY]

- I.G.3. Demolition and Renovation (Asbestos) - The permittee shall comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR Part 61 Subpart M, 2016] [SRCAA Regulation I, Section 2.17, 7/9/20, which adopts by reference 40 CFR 61, Subpart M, 2016] [SRCAA Regulation I, Article IX, 8/5/10 - STATE/LOCAL ONLY]
- I.G.4. Source Testing - To demonstrate compliance, Ecology or SRCAA may conduct or require that a test be conducted using approved EPA methods from 40 CFR Parts 51, 60, 61, and 63 Appendix A, which are adopted by reference, or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," State of Washington, Department of Ecology, as of September 20, 2004, on file at Ecology. All testing shall be performed in accordance with SRCAA Regulation I, Section 2.09, "Source Tests." The permittee may be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emission unit. Ecology or SRCAA shall be allowed to obtain a sample from any emission unit. The permittee shall be given an opportunity to observe the sampling and to obtain a sample at the same time.
- Methods or procedures shall be considered approved if the source submits a source test plan to SRCAA at least 30 days prior to the testing date, or a shorter time if designated in writing by SRCAA, and SRCAA approves the plan in writing. In order to maintain the approved status for the methods and/or procedures, any changes to the plan shall be approved by SRCAA in writing prior to implementation. [WAC 173-401-615(1), 9/16/02] [SRCAA Regulation I, Section 2.09, 7/9/20]
- I.G.5. Chemical Accident Prevention Provisions - If regulated substances are stored on-site at the process level quantities, and these quantities are above the thresholds specified under 40 CFR §68.115, Fiber-Tech shall comply with the requirements of 40 CFR Part 68 - Chemical Accident Prevention Provisions no later than either three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR §68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. [40 CFR Part 68, 12/19/19]
- I.G.6 Reporting of Emissions of Greenhouse Gases – If greenhouse gas emissions increase above the threshold specified in WAC 173-441-030(1)(a) (10,000 metric tons CO₂e per year) Fiber-Tech shall comply with the reporting requirements under Chapter 173-441 WAC. [WAC 173-441, 9/15/16 – STATE/LOCAL ONLY]

II. EMISSIONS LIMITATIONS & MONITORING, RECORDKEEPING & REPORTING

This section contains emission limitations and emission related requirements, including general requirements for the facility. The section is divided into several subsections. The first subsection lists limitations that apply facility-wide. Other subsections focus on individual emission units/activities or classes of similar emission units/activities. As in all other sections of the permit, requirements that are not required under the FCAA are indicated by the phrase

"STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

This section of the permit is formatted differently from the STANDARD TERMS AND CONDITIONS section. Requirements are presented in tables. Applicable requirements are listed in the third column in emission limitation tables. The basis for the applicable requirements is listed in the second column of the emission limitation tables. The averaging time and reference test method, used to determine compliance with the requirement, are listed in the fourth and fifth columns, if applicable. The monitoring, recordkeeping, and reporting requirements (MRRR) used to assure compliance with the requirement are listed in the sixth columns of the emission limitation tables. The monitoring, recordkeeping, and reporting requirements (MRRR) are enforceable and are given in the last subsection in the permit. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying emission limitation.

For Fiber-Tech, this section contains four subsections:

FACILITY-WIDE EMISSIONS LIMITATIONS;
GEL COAT & FIBERGLASS LAMINATION EMISSION LIMITATIONS;
WOOD WORKING/DUST COLLECTION EMISSION LIMITATIONS; and
MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (MRRR).

Each subsection and its contents are discussed in detail below except for the MRRR. MRRR are discussed in context of the requirement(s) to which they apply.

If an applicable requirement does not include sufficient monitoring, recordkeeping, and reporting to satisfy WAC 173-401-615(1) & (2), the permit will establish adequate monitoring, recordkeeping and reporting. This is known as gapfilling. Applicable requirements for which this type of gapfilling is proposed can be identified by the note, following the MRRR citation, indicating that at least a portion of the MRRR is from gapfilling.

A. Facility-wide Emissions Limitations

This subsection contains applicable emission limitations that apply facility-wide. The facility-wide emission limitations apply to insignificant emissions units. However, monitoring, recordkeeping and reporting requirements are not required for the insignificant emission units because SRCAA has determined that they are not necessary to assure compliance with facility-wide emission limitations. Fiber-Tech is required to certify compliance with the facility-wide emission limitations for insignificant emission units.

The following requirements are included in this section.

Condition II.A.1: All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040(1)(c)

[SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(1)(c) (8/16/18)]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition II.A.2: Visible emissions shall not exceed 20% for an aggregate of more than three minutes in any one hour, except as otherwise allowed in WAC 173-400-040(2), as determined using Ecology Method 9A.

[SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(2) (8/16/18)]

MRRR: Fiber-Tech is required to perform weekly inspections during daylight hours while the facility is operating for the purpose of observing points of visible emissions and PM emissions from all emission units and activities at the facility which are subject to opacity or particulate standards.

a) The weekly inspections shall be conducted as follows:

- 1) each inspection shall be conducted from a location(s) with a clear view of each emission source where the sun is not directly in the observer's eyes. The inspection location(s) shall be at least 15 feet but not more than 0.25 miles from the emission source;
- 2) the observer shall be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, and observer position relative to the source and sun);
- 3) each inspection shall consist of a minimum 15-second visual observation of each emission source to identify those emission sources which exhibit visible emissions; and
- 4) records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If visible emissions are not observed from any emission source at the facility during the weekly inspection, no additional action is required. If visible emissions are observed from any emission source, the permittee shall take further action according to b).

b) If visible emissions are observed during an inspection or are otherwise

observed by the permittee, the permittee shall verify and certify that:

- 1) the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
- 2) the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and
- 3) if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If b) 1), b) 2), and/or, b) 3) are not being met, corrective action must be taken as soon as possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

The permittee shall keep records of any verifications made regarding b) 1), b) 2), and/or b) 3) and a description of any corrective action taken. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If b) 1), b) 2), and b) 3), are being met, but visible emissions are still observed, the permittee shall take further action according to c).

c) If visible emissions are still observed and b) 1), b) 2), and b) 3) are being met, the permittee shall perform testing according to c) 1).

- 1) As a means of demonstrating compliance with the visible emissions standard(s), the permittee shall perform, or have performed, RM 9 (July 1, 2009) or Ecology Method 9A (September 20, 2004), whichever is applicable, on the source of the visible emissions. The test shall occur within a reasonable timeframe but no later than 24 hours after discovery of the emissions. If the visible emissions exceed the applicable standard, the permittee shall take timely and appropriate corrective action (as soon as possible, but within 24 hours) to address the problem. The results of the RM 9 or Ecology Method 9A test shall be submitted to SRCAA within two working days of the test.

[WAC 173-401-615(1) & (2), 9/16/02] [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-050(1), (8/16/18)] [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-060 (10/25/18)] NOTE: This is a gapfilling MRRR.

Condition II.A.3: Visible Emissions shall not equal or exceed 20%, as specified in Regulation I of SRCAA, Section 6.02 - STATE/LOCAL ONLY [SRCAA Regulation I, 6.02, 7/9/20- STATE/LOCAL ONLY]

MRRR: The same monitoring is required as for Visible Emissions, WAC 173-400-040, in Condition I.A.2 [WAC 173-401-615(1) & (2), 9/16/02] [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-050(1), (8/16/18)] [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-060 (10/25/18)] NOTE: This is a gapfilling MRRR.

Condition II.A.4: No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(3) (8/16/18) – STATE/LOCAL ONLY]

MRRR: Fiber-Tech must perform weekly inspections of the facility during daylight hours to verify that fallout is not occurring and must record and investigate complaints received regarding fallout. Potential particulate matter emissions from the facility include dust from baghouse load-outs. Weekly inspections should reasonably assure compliance because Fiber-Tech has a consistent compliance history (i.e., the likelihood of violation is low). During normal operation, fugitive particulate matter is not visible at the facility. If potential violations of the requirement are observed during the weekly inspections and/or as part of the complaint investigation, Fiber-Tech must take timely and appropriate corrective action. Taking corrective action does not relieve Fiber-Tech from the obligation to comply with the underlying emission limitation, nor does it relieve Fiber-Tech from reporting any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

Fiber-Tech must maintain records of each inspection and complaint investigation. Records must include the date and time of the inspection, observations made, the date and time of any complaints received, the date and time of the complaint investigation, the results of complaint investigations, a description of any corrective action taken, and any other information required in permit Condition I.D.1-Records of Required Monitoring Information. Records must be kept in accordance with Condition I.D.5-Retention of Records, and, upon request, such records must be made available for inspection by SRCAA staff or other authorized representatives.

For permit conditions that require reasonable precautions to be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, examples of reasonable precautions; recognized good

practices and procedures; and effective control apparatus and measures are given in the permit.

[WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.A.5: Reasonable precautions must be taken to:

- a. Prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads;
- b. Prevent tracking of PM onto paved roadways open to the public;
- c. Prevent the release of air contaminants, as specific in WAC 173-400-040(3)(a), if located in an attainment area and not impacting a NAA;
- d. Prevent PM from becoming airborne when handling, transporting, and /or storing PM; and
- e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.

Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.

[SRCAA Regulation I, 6.05.C, 7/9/20] [SRCAA Regulation I, 6.05.D, 7/9/20]
[SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference
WAC 173-400-040(4) & (9) (8/16/18)] [SRCAA Regulation I, 6.05.B, 7/9/20]

MRRR: The same monitoring is required as for WAC 173-400-040(3) – Fallout, see Condition II.A.4, above. Fiber-Tech must perform weekly inspections during daylight hours while the emissions unit and/or activity is in operation, investigate complaints, and take corrective action, if problems are identified. A monitoring plan is required and records must be kept. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.A.6: Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(5) – STATE / LOCAL ONLY [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(5) (8/16/18) – STATE/LOCAL ONLY]

MRRR: The monitoring is the same as required for WAC 173-400-040(3) - Fallout, see Condition II.A.4 above. Fiber-Tech must perform weekly inspections during daylight hours of the emission units at the facility, investigate complaints, and take corrective action if potential problems are identified. Examples of what are considered recognized good practices and procedures for odors are included in the monitoring condition. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.A.7: It shall be unlawful for any person to cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be:

- a. Injurious to the health and safety of human, animal or plant life;
- b. Injurious or cause damage to property; or
- c. Which unreasonably interferes with enjoyment of life and property.

Compliance with this requirement shall be determined per the provisions given in SRCAA Regulation I, Section 6.04 (7/9/20) - STATE / LOCAL ONLY

[SRCAA Regulation I, Section 6.04, 7/9/20]

MRRR: The monitoring is the same as required for WAC 173-400-040(3) - Fallout, see Condition II.A.4 above. Fiber-Tech must perform weekly inspections during daylight hours of the emission units at the facility, investigate complaints, and take corrective action if potential problems are identified. Examples of what are effective control apparatus and measures to reduce odors are included in the monitoring condition. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.A.8: No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of SRCAA Regulation I. [SRCAA Regulation I, 6.07, 7/9/20]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition II.A.9: Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf, corrected to 7% oxygen, as specified in WAC 173-400-050(1) & WAC 173-400-050(3). [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-050(1) & (3) (8/16/18)]

MRRR: No monitoring, recordkeeping, or reporting is required. The only combustion and incineration units that exist at Fiber-Tech are insignificant emission units. SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units at Fiber-Tech to assure compliance with the generally applicable requirements (see section on Insignificant Emission Units for more information).

Condition II.A.10: Particulate matter emissions from general process units must not exceed 0.1

gr/dscf. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-060 (10/25/18)]

MRRR: Because of the general correlation between particulate matter emissions and visible emissions (i.e., visible emissions are an indicator of particulate matter), monitoring focuses on identifying visible emissions. Fiber-Tech must perform weekly inspections during daylight hours for the purpose of identifying visible emissions. Weekly inspections should reasonably assure compliance because Fiber-Tech has a consistent compliance history and because the facility runs at a fairly consistent production rate. Particulate matter from emission units at the facility should be low because all of the emission units that emit particulate matter are equipped with air pollution control equipment (e.g., dry filtration on gel coat application process and baghouses on wood working equipment).

None of the emission units subject to this requirement have been source tested for particulate in the past, so there is not an established relationship between particulate emissions and opacity for the units. However, the “no visible emissions” (a.k.a., “smoke / no smoke”) concept is acceptable monitoring for the particulate emission standard because SRCAA is of the opinion that something will be visible before a compliance problem exists.

If visible emissions are observed during an inspection or are otherwise observed by the permittee, the permittee shall verify and certify that:

- 1) the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
- 2) the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and
- 3) if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If 1), 2), and/or 3) are not being met, corrective action must be taken as soon as possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

The permittee shall keep records of any verifications made regarding 1), 2), and/or 3) and a description of any corrective action taken. Records shall be kept in accordance Condition I.D.5 - Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If 1), 2), and 3), are being met, but visible emissions are still observed, the permittee shall take further action according to c).

If visible emissions are still observed and 1), 2), and 3) are being met, the permittee shall perform shall perform, or have performed, RM 5 (2010) on the source of the emissions. The test shall occur within a reasonable timeframe but no later than 30 days after discovery of the emissions. The results of the RM 5 test shall be submitted to SRCAA as soon as possible but no later than 45 days after the testing. If measured emissions exceed the applicable standard, the permittee shall take appropriate and timely corrective action to address the problem.

[WAC 173-401-615(1) & (2), 9/16/02] [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-050(1), (8/16/18)] [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-060 (10/25/18)] NOTE: This is a gapfilling MRRR.

Condition II.A.11: SO₂ emissions from each unit shall not exceed 1000 ppm on a dry basis, corrected to 7% oxygen, as specified in WAC 173-400-040(7). [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(7) (8/16/18)]

MRRR: No monitoring, recordkeeping, or reporting is required. The only emission units that emit SO₂ at Fiber-Tech are insignificant emission units. SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units at Fiber-Tech to assure compliance with the generally applicable requirements (see section on Insignificant Emission Units for more information).

Condition II.A.12: No use of excess stack height or dispersion techniques to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200. [WAC 173-400-200, 2/19/91]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition II.A.13: No varying of emissions according to atmospheric conditions or ambient concentrations except as allowed under WAC 173-400-205. [WAC 173-400-205, 2/19/91]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable

inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition II.A.14: No outdoor burning, except as allowed under Chapter 173-425 WAC and/or Regulation I of SRCAA, Section 6.01 [SRCAA Regulation I, Section 2.14(A)(3), 7/9/20, which adopts by reference Chapter 173-425 WAC (3/13/00) – STATE/LOCAL ONLY] [SRCAA Regulation I, 6.01, 7/9/20 - STATE/LOCAL ONLY] [Chapter 173-425 WAC, 10/18/90]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition II.A.15: Handling and use of ozone-depleting substances must be in accord with 40 CFR Part 82. [40 CFR Part 82, 4/10/20]

MRRR: Additional monitoring, recordkeeping, and reporting requirements are not necessary to assure compliance with this condition, because the monitoring, recordkeeping, and reporting requirements are included with the applicable requirement (i.e., 40 CFR Part 82, 4/10/2020). As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

B. Gel Coat & Fiberglass Lamination Emission Limitations

This portion of the permit lists the requirements for Gel Coat & Fiberglass Lamination Operations. The specific emissions units covered in this section of the permit are given in Table 2 on Page 13. Both the gel coat and fiberglass lamination operations are subject to the requirements in Notice of Construction #706. In addition, Fiber-Tech is subject to the requirements given in 40 CFR Part 63, Subpart WWWW, "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." Subpart WWWW applies to the open molding process, mixing, cleaning of equipment used in the reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts manufactured at Fiber-Tech.

The general requirements listed in the facility-wide emissions limitations subsection (Section II.A) are re-listed in this section only if additional monitoring beyond that required in Section II.A is necessary to assure compliance; however, they are still applicable to the above sources. The following requirements are included in this section.

Condition II.B.1: All equipment associated with the fiberglass reinforced plywood operation shall be maintained in good operating condition (i.e., gelcoating equipment; lamination equipment, exhaust fans, filters, etc.) [NOC #706 Condition #5, 9/5/01 as revised]

on 12/8/10]

MRRR: The permittee shall develop and follow an operation and maintenance plan for the gel coat and lamination operations. The following records shall be kept in accordance with Condition I.D.1 – Records of Required Monitoring Information and Condition I.D.5 – Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

1. Date and nature of all maintenance activities performed on process equipment;
2. Gel coat filter records, including the following:
 - i. Dates when filters are replaced;
 - ii. Changes in type of gelcoating process filter media; and
 - iii. Vendor data that includes capture efficiency; and
2. Manufacturer's or other data on the gel coat spray equipment that verifies its transfer efficiency.

[NOC #706, Condition #4 & #15, 9/15/01 as revised on 12/8/10]

Condition II.B.2: The fans along the north side of the building and the gelcoat application process exhaust stacks shall exhaust a minimum of 39 feet above the ground and shall exhaust vertically. There shall be no flow obstructions (horizontal exhausting elbows, tees, or "china" caps, etc...) at the top of the stacks that impede vertical flow of the exhaust. [NOC #706 Condition #6, 9/5/01 as revised on 12/8/10]

MRRR: Fiber-Tech submitted written verification (letter from Roger Mola dated 9/20/02) to confirm that the stacks are at least 39' above the ground and exhaust vertically. Unless changes are made to the stacks, the stack heights and exhaust configuration should not change. Therefore, no monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period.

Condition II.B.3: Visible emissions from any process stack, including the four north side fan stacks, shall not exceed 10% opacity during any six-minute average. [NOC #706 Condition #11, 9/5/01 as revised on 12/8/10]

MRRR: The monitoring is the same as for Condition II.A.2. Fiber-Tech must perform weekly inspections during daylight hours, while the facility is operating, for the purpose of identifying potential visible emissions standard violations. Weekly inspections should reasonably assure compliance because Fiber-Tech has a consistent compliance history (i.e., the likelihood of violation is low) and because particulate emissions from the gel coat spray application process are controlled

with dry filters.

In addition to the weekly inspections, Fiber-Tech is required to prepare and implement an operation & maintenance plan for the gel coat and lamination operations, which covers the gel coat spray application process (see MRRR associated with Condition II.B.1 for description of O&M requirement).

[NOC #706, Condition #4 & #15, 9/15/01 as revised on 12/8/10] [WAC 173-401-615(1) & (2), 9/16/02] - portions of this MRRR are gapfilled.

Condition II.B.4: The gelcoat application process exhaust filters must be designed to capture the gel coat overspray. The filters must completely cover the openings to the exhaust ducting such that no gaps, leaks, etc. exist. Filters must be replaced as often as required in order to prevent sagging of the filter media and break through of gelcoat particulate. [NOC #706 Condition #7, 9/5/01 as revised on 12/8/10]

MRRR: The monitoring is the same as for Condition II.B.3. Monitoring involves weekly inspections and proper operation & maintenance. [NOC #706, Condition #4 & #15, 9/15/01 as revised on 12/8/10] [WAC 173-401-615(1) & (2), 9/16/02] - portions of this MRRR are gapfilled.

Condition II.B.5: Fiber-Tech shall use the gelcoat application equipment installed in 2006 or another SRCAA approved application method. [NOC #706, Condition #8, 9/5/01 as revised on 12/8/10]

MRRR: As part of the required records, Fiber-Tech is required to keep manufacturer's or other data on the gel coat spray equipment that verifies its transfer efficiency. In addition, as with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period. [NOC #706, Condition #4 & #15, 9/15/01 as revised on 12/8/10]

Condition II.B.6: The use of Methylene Chloride is prohibited in any operation at the facility. [NOC #706, Condition #9, 9/5/01 as revised on 12/8/10]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period. Fiber-Tech discontinued usage of methylene chloride as solvent in October 1998, when their methylene chloride tank was removed.

Condition II.B.7: Total VOCs and styrene emissions shall not exceed 81.4 tons per calendar year. [NOC #706, Condition #8, 9/5/01 as revised on 12/8/10]

MRRR: Fiber-Tech is required to keep the following records in accordance with Condition I.D.1 – Records of Required Monitoring Information and Condition I.D.5 –

Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives:

- a) Material Safety Data Sheets (MSDS) and/or Certified Product Data Sheets (CPDS), and/or batch information data sheets (BIDS) or other data sheets which clearly indicate the VOC and styrene content (SARA reporting information) and toxic air pollutant data of each of the materials used;
- b) Records of recycled materials (including the volume recycled); and
- c) Amount of each process material (gelcoat, resin, catalyst, adhesive, and solvent, etc.) used each year.

[NOC #706, Condition #15, 9/5/01 as revised on 12/8/10]

Condition II.B.8: All solvents containing volatile organic compounds (VOC) or volatile toxic air pollutants (TAPs), flushed through spray equipment during equipment cleaning shall be collected in closed containers without atomization of the solvent into the air. [NOC #706, Condition #12, 9/5/01 as revised on 12/8/10]

MRRR: The monitoring is the same as required for Condition II.A.4. Fiber-Tech must perform weekly inspections during daylight hours to check if all solvents flushed through spray equipment during cleaning are collected in closed containers and take corrective action if problems are identified. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.B.9: Spills of materials, associated with the gel coat spray application process or fiberglass lamination operation, containing (VOC) or volatile TAPs shall be cleaned up upon discovery, and the waste shall be stored in closed containers. [NOC #706, Condition #14, 9/5/01 as revised on 12/8/10]

MRRR: The monitoring is the same as required for Condition II.A.4. Fiber-Tech must perform weekly inspections during daylight hours to check if all spills containing VOC or volatile TAPs are cleaned up upon discovery and the waste is stored in closed containers. If problems are identified, corrective action must be taken. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.B.10: A copy of the revised Notice of Construction #706 application and the final order of approval shall be kept on site and made available to SRCAA personnel upon request. [NOC #706, Condition #2, 9/5/01 as revised on 12/8/10]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition II.B.11: The permittee shall not build, erect, install, or use any article, machine,

equipment, or process to conceal an emission that would otherwise be in noncompliance with a relevant standard under 40 CFR Part 63. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.4(b), 4/5/02] [NOC #706, Condition #10, 9/5/01 as revised on 12/8/10]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition II.B.12: At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source under 40 CFR 63, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions, according to the provisions of 40 CFR § 63.6(e), 2006.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5805(b) and (g), 8/25/05; §63.5835(a), 3/20/20; §63.5900(c), 3/20/20; and §63.5790(d), 8/25/05] [NOC #706, Condition #10, 9/5/01 as revised on 12/8/10]

MRRR: The monitoring is the same as for Condition II.B.1. Fiber-Tech is required to develop and follow an operation and maintenance plan for the gel coat and lamination operations and keep records of maintenance performed. [NOC #706, Condition #4 & #15, 9/15/01 as revised on 12/8/10] [WAC 173-401-615(1) & (2), 9/16/02]

Condition II.B.13: The open molding and repair operations shall meet the applicable annual average organic HAP emissions limits in Table 3 to Subpart WWWW of Part 63 at all times. Production resins that must meet military specifications are allowed to meet the organic HAP limit contained in that specification, provided that the requirements given in 63.5790(d), 8/25/05 are met.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5805(b) and (g), 8/25/05; §63.5835(a), 3/20/20; §63.5900(c), 3/20/20; and §63.5790(d), 8/25/05] [NOC #706, Condition #10, 9/5/01 as revised on 12/8/10]

MRRR: The MRRR for this condition are outlined in the reinforced plastic composites MACT, given in 40 CFR 63, Subpart WWWW. Fiber-Tech is required to use one of the following methods in paragraphs (a) through (d) below to meet the HAP emissions limits. Currently, Fiber-Tech is using option a), where all materials meet the individual HAP emissions limit (i.e., compliant coating option). However, they could switch to another compliance method in the future.

a) Meet the individual organic HAP emissions limit for each operation, given in Table 3 to Subpart WWWW of Part 63, according to the procedure given in

40 CFR §63.5810(a);

- b) Demonstrate compliance using the HAP emissions factor averaging option, according to the procedure given in 40 CFR §63.5810(b);
- c) Meet the organic HAP emissions limits for one operation type, and use the same resin(s) for all operations of that resin type, according to the procedure given in 40 CFR §63.5810(c); or
- d) Use resins and gel coats that do not exceed the maximum organic HAP contents shown in Table 3 to Subpart WWWW of Part 63.

All monthly calculations required under options (b) and (c) must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in (a) through (d) above. When the permittee changes to a compliance option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the compliance option currently being used (i.e., the new compliance option), unless the compliant materials option was used, as described in paragraph (d). In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

Fiber-Tech is required to keep required records and submit a semi-annual compliance report to EPA and SRCAA which states if there were any deviations from the HAP emission limitations.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5810, 5840 & 5860, 8/25/05; §63.5895, 5900, 5910, 5915 & 5920, 3/20/20; §63.5900(c), 3/20/20; and §63.10(b)(1) and (b)(2)(xiv), 4/20/06]

Condition II.B.14: The permittee may not use cleaning solvents that contain HAP (hazardous air pollutants, as designated under Title I of the Federal Clean Air Act), 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.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5805(b) & (g), 8/25/05; §63.5835(a) & 5900(c), 3/20/20] [NOC #706, Condition #10, 9/5/01 as revised on 12/8/10]

MRRR: The MRRR for this condition are outlined in the reinforced plastic composites MACT, given in 40 CFR, Subpart WWWW. Fiber-Tech is required to submit a semi-annual monitoring report to EPA and SRCAA which states if they met all of the work practice standards during the reporting period (Condition II.B.14 is

considered a work practice standard). Fiber-Tech is also required to keep records for five years, including a certified statement that they are in compliance with the work practice requirements given in Conditions II.B.14 - II.B.16.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5900, 5910, 5915, & 5920, 3/20/20 and §63.10(b)(1) and (b)(2)(xiv), 4/20/06]

Condition II.B.15: The permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing storage tanks may be vented as necessary for safety.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5805(b) & (g), 8/25/05; §63.5835(a) & 5900(c), 3/20/20] [NOC #706, Condition #10, 9/5/01 as revised on 12/8/10]

MRRR: The MRRR for this condition are outlined in the reinforced plastic composites MACT, given in 40 CFR, Subpart WWWW and are the same as for Condition II.B.14. Fiber-Tech is required to submit a semi-annual monitoring report and keep records.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5900, 5910, 5915, & 5920, 3/20/20 and §63.10(b)(1) and (b)(2)(xiv), 4/20/06]

Condition II.B.16: The permittee must 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. The permittee must keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels, or as necessary prior to adding materials or opening the cover for safety.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5805(b) & (g), 8/25/05; §63.5835(a) & 5900(c), 3/20/20] [NOC #706, Condition #10, 9/5/01 as revised on 12/8/10]

MRRR: The MRRR for this condition are outlined in the reinforced plastic composites MACT, given in 40 CFR, Subpart WWWW and are the same as for Condition II.B.14. Fiber-Tech is required to submit a semi-annual monitoring report and keep records.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5900, 5910, 5915, & 5920, 3/20/20 and §63.10(b)(1) and (b)(2)(xiv), 4/20/06]

Some conditions from 40 CFR Part 63, Subpart WWWW and NOC #706 are no longer applicable because they are one-time requirements that have been satisfied. These conditions are listed below and are not included in the Fiber-Tech's operating permit. In addition to the requirements listed below, the requirements from the Assurance of Discontinuance and associated Compliance Plan are not included in the permit because they have all been met.

CITATION	DESCRIPTION	REASON NOT INCLUDED IN THE PERMIT
40 CFR §63.5905, 4/21/03	Initial notification and compliance status report	Fiber-Tech submitted the initial notification to SRCAA on July 31, 2003. The notification of compliance status report was submitted to SRCAA on April 13, 2006. This is a one-time requirement that has been met.
NOC #706, Condition 1, 9/5/01 as revised on 3/22/07 and 7/26/07	Initial notification of when fan exhausts have been extended	Fiber-Tech notified SRCAA via e-mail on 10/24/07 that the work was being completed during that week.

C. Wood Working/Dust Collection Emission Limitations

This portion of the permit lists the requirements for Wood Working / Dust Collection operations. The specific emissions units covered in this section of the permit are given in Table 3 on Page 14. This area is subject to the requirements in Notices of Construction #714 and #1404. These two Notices of Construction cover the installation and operation of two baghouses, both located outside Building #25. Both baghouses control the dust from wood working equipment at Fiber-Tech.

The general requirements listed in the facility-wide emissions limitations subsection (Section II.A) are re-listed in this section only if additional monitoring beyond that required in Section II.A is necessary to assure compliance; however, they are still applicable to the above sources.

The following requirements are included in this section.

Condition II.C.1:#1-4 – 4A: Particulate matter emissions from the baghouse approved under NOC #714 shall not exceed 0.01 grains per dry standard cubic foot of exhaust flow. [NOC #714 Condition #2, 12/18/95]

MRRR: Because of the general correlation between particulate matter emissions and visible emissions (i.e., visible emissions are an indicator of particulate matter), monitoring focuses on identifying visible emissions. Fiber-Tech must perform weekly inspections during daylight hours for the purpose of identifying visible emissions. Inspections are only required weekly because the baghouse has a consistent compliance history. However, since baghouses tend to have catastrophic breakdowns (i.e., bag breaks, etc.), periodic inspections are important for identifying visible emissions, which are an indicator of problems

with the baghouse.

The baghouse has not been source tested for particulate in the past, so there is not an established relationship between particulate emissions and opacity for the units. However, the “no visible emissions” (a.k.a., “smoke / no smoke”) concept is acceptable monitoring for the particulate emission standard because SRCAA is of the opinion that something will be visible before a compliance problem exists.

If visible emissions are observed during an inspection or are otherwise observed, Fiber-Tech shall verify and certify that:

- 1) the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
- 2) the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and
- 3) if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If 1), 2), and/or 3) are not being met, corrective action must be taken as soon as possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve Fiber-Tech from complying with the underlying requirement, nor does it relieve Fiber-Tech from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

Fiber-Tech must keep records of any verifications made regarding 1), 2), and/or 3) and a description of any corrective action taken. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If 1), 2), and 3), are being met, but visible emissions are still observed, Fiber-Tech shall take further action according to c).

If visible emissions are still observed and 1), 2), and 3) are being met, Fiber-Tech shall perform shall perform, or have performed, RM 5 (July 1, 2012) on the source of the emissions. The test shall occur within a reasonable timeframe but no later than 30 days after discovery of the emissions. The results of the RM 5 test shall be submitted to SRCAA as soon as possible but no later than 45 days after the testing. If measured emissions exceed the applicable standard, the permittee shall take appropriate and timely corrective action to address the problem.

In addition, Fiber-Tech must properly operate and maintain the baghouse, prepare and implement an operation and maintenance plan, maintain the pressure drop within the acceptable range, and keep monitoring and maintenance records. If the equipment is properly maintained and operated, the particulate matter emission limit should be met.

[NOC #714, Conditions #3 & #7, 12/18/95] [WAC 173-401-615(1) & (2), 9/16/02]
– portions of this MRRR are gapfilling

Condition II.C.2:#1-4 – 4A: The baghouse shall be maintained in good operating condition. [NOC #714, Condition #3, 12/18/95]

MRRR: Fiber-Tech is required to properly operate and maintain the baghouse, which includes:

- a) Following manufacturer operation and maintenance manuals, if available;
- b) If manufacturer operation and maintenance manuals are not available, implementing procedures necessary to properly maintain the equipment, including but not limited to proper maintenance of all motors, fans, bags or cartridges, etc...;
- c) Maintaining a pressure drop within the range of 1 - 8 inches of water; and
- d) Implementing procedures to ensure that particulate emissions to the air are minimized during dust bin or hopper clean out and during filter media cleaning or changing.

Fiber-Tech is required to develop and follow an operation and maintenance plan that includes, at a minimum, items a) through d) above.

Fiber-Tech is required to conduct daily checks of the baghouse pressure drop. If the baghouse pressure drop is outside of the range given in c) above, corrective action must be taken as soon as possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve Fiber-Tech from the obligation to report any permit deviations as required in Condition I.D.7 – Prompt Reporting of Deviations.

Fiber-Tech must keep the following records in accordance with Condition I.D.1 – Records of Required Monitoring Information and Condition I.D.5 – Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

1. Maintenance records for the baghouse, including the following:
 - i. Logs of actual maintenance inspections and observations made during inspections;
 - ii. Dates and nature of any other maintenance activities performed; and
 - iii. Times and dates of bag/cartridge failures and change outs and position of

the replaced bags.

2. Records of the daily baghouse pressure drop readings and any corrective actions taken as a result of the readings.

[NOC #714, Conditions #3 & #7, 12/18/95] [WAC 173-401-615(1) & (2), 9/16/02]

Condition II.C.3:#1-4 – 4A: The baghouse may only be bypassed in the event of an emergency. The bypass may continue only as long as it takes to shut down the emission sources feeding into the system. [NOC #714, Condition #4, 12/18/95]

MRRR: The monitoring is the same as required for Condition II.C.2. Fiber-Tech must properly operate and maintain the baghouse, prepare and implement an operation and maintenance plan, monitor the baghouse pressure drop, and keep monitoring and maintenance records. If the baghouses are properly operated and maintained, occurrences when the baghouses are bypassed will be minimized.

[NOC #714, Conditions #3 & #7, 12/18/95] [WAC 173-401-615(1) & (2), 9/16/02]
– portions of this MRRR are gapfilled

Condition II.C.4: #1-4 – 4A: The permittee shall minimize fugitive emissions to the outside by:

- a. Keeping the load out area and roadway clean;
- b. Having an employee present during load out; and
- c. Enclosing the load out area to the extent possible.

[NOC #714, Condition #5, 12/18/95]

MRRR: Fiber-Tech is required to properly operate and maintain the baghouse and the respective wood-waste bins and load-outs, which includes implementing reasonable precautions to prevent fugitive dust from becoming airborne from the processing equipment, transfer points, parking areas, and other sources of particulate matter and to ensure that particulate emissions to the air are minimized during dust bin or hopper clean out and during filter media cleaning or changing. An O&M plan and maintenance records are required to ensure that the baghouse is properly operated and maintained.

[NOC #714, Conditions #3 & #7, 12/18/95] [WAC 173-401-615(1) & (2), 9/16/02]
– portions of this MRRR are gapfilled

Condition II.C.5:#1-4 – 4A: Visible emissions from the load out area, baghouse exhaust, and collection bin vents shall not exceed 5%. [NOC #714, Condition #6, 12/18/95]

MRRR: The same monitoring is required as for the facility-wide visible emissions requirement given in Condition II.A.2. Fiber-Tech must perform weekly inspections during daylight hours while the facility is in operation for the purpose of identifying visible emissions

Inspections are only required weekly because the baghouse has a consistent

compliance history. However, since baghouses tend to have catastrophic breakdowns (i.e., bag breaks, etc.), periodic inspections are important for assuring compliance with the visible emissions standard.

In addition, Fiber-Tech must properly operate and maintain the equipment, prepare and implement an operation and maintenance plan, monitor the baghouse pressure drop, and keep monitoring and maintenance records. If the equipment is properly maintained and operated, the opacity standard should be met.

Opacity from a baghouse should not be higher than 5-10%, unless there is some type of malfunction. Typically, baghouses do not slowly degrade. Instead, they have some type of catastrophic failure (e.g., bag break, etc.). Based on engineering judgment, if the baghouse is properly operated and maintained, the opacity should not exceed 5%.

[NOC #714, Conditions #3 & #7, 12/18/95] [WAC 173-401-615(1) & (2), 9/16/02]
– portions of this MRRR are gapfilling

Condition II.C.6:#1-4 – 4A: Proper procedures shall be used to ensure that particulate emissions are minimized during dust bin or hopper clean out, filter media cleaning or changing, or in any other phase of operations. Particulate collection for disposal shall not be attempted during periods of high wind unless a SRCAA approved enclosure shields the process from the wind. [NOC #714, Condition #7, 12/18/95]

MRRR: Fiber-Tech is required to properly operate and maintain the baghouse and wood-waste bins and load-outs, which includes implementing procedures to ensure that particulate emissions to the air are minimized during dust bin or hopper clean out and during filter media cleaning or changing. An O&M plan and maintenance records are required to ensure that the baghouse is properly operated and maintained.

[NOC #714, Conditions #3 & #7, 12/18/95] [WAC 173-401-615(1) & (2), 9/16/02]
– portions of this MRRR are gapfilled.

Condition II.C.7:#1-4 – 4A: A copy of the NOC #714 application forms and conditions of approval shall be posted near the baghouse for review by SRCAA staff. [NOC #714, Condition #10, 12/18/95]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition II.C.8:#1-4 – 4A: Damaged and/or used filters shall be handled and disposed of in a manner that will not contribute to an increase of particulate matter (i.e., fugitive

dust). [NOC #714, Condition #12, 12/18/95]

MRRR: Fiber-Tech is required to properly operate and maintain the baghouse, which includes implementing procedures to ensure that particulate emissions to the air are minimized during dust bin or hopper clean out and during filter media cleaning or changing. An O&M plan and maintenance records are required to ensure that the baghouse is properly operated and maintained. [NOC #714, Conditions #3 & #7, 12/18/95] [WAC 173-401-615(1) & (2), 9/16/02] – portions of this MRRR are gapfilled.

Condition II.C.9: A copy of the NOC #1404 application and the conditions of approval shall be kept on site and made available to SRCAA personnel upon request. [NOC #1404, Condition 2, 10/2/07, as revised on 6/5/15 and 11/15/19]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition II.C.10: The sizing/trim saw approved under NOC #1404 shall be vented to the Torit baghouse whenever the saw is in operation. The baghouse shall be operated whenever the sizing/trim saw is in operation. The four other saws (table saw, beam saw, and 2 Rogers saws) are required to be connected to the baghouse only if the saws are exhausted to the outside. [NOC #1404, Condition 3, 10/2/07, as revised on 11/15/19]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition II.C.11: The baghouse approved under NOC #1404 shall be maintained in good operating condition. [NOC #1404, Condition 4, 10/2/07, as revised on 11/15/19]

MRRR: Fiber-Tech is required to develop an operation and maintenance (O&M) plan which provides a description of how the dust collector approved under NOC #1404 will be operated to minimize air emissions. Manufacturers' O&M manuals may be referenced. The most recent O&M plan developed must be kept on site and made available to SRCAA personnel at the time of the initial compliance inspection. The O&M plan shall at a minimum include:

- a) Normal operating parameters for the baghouse, including acceptable pressure drop range for the baghouse;
- b) Maintenance schedule for the baghouse;
- c) Monitoring and record keeping requirements for the baghouse;
- d) Corrective actions for abnormal baghouse operation;

- e) Proper procedures to be used to ensure that particulate emissions are minimized during filter media cleaning, changing, and disposal; and
- f) Proper procedures to be used to ensure that particulate emissions are minimized during handling and transfer of particulate collected in the baghouse hopper.

Records must be kept of all monitoring and maintenance performed on the baghouse, including time and dates of bag failures, bag change outs, and position of replaced bags. The records shall be kept in accordance with Condition I.D.1 – Records of Required Monitoring Information and Condition I.D.5 – Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

[NOC #1404, Conditions 4 &5, 10/2/07, as revised on 11/15/19]

Condition II.C.12: Visible emissions from the baghouse exhaust approved under NOC #1404 shall not exceed 10%. [NOC #1404, Condition 6, 10/2/07, as revised on 11/15/19]

MRRR: The same monitoring is required as for the facility-wide visible emissions requirement given in Condition II.A.2. Fiber-Tech must perform weekly inspections during daylight hours while the facility is in operation for the purpose of identifying visible emissions

Inspections are only required weekly because the baghouse has a consistent compliance history. However, since baghouses tend to have catastrophic breakdowns (i.e., bag breaks, etc.), periodic inspections are important for assuring compliance with the visible emissions standard.

In addition, Fiber-Tech must properly operate and maintain the equipment, prepare and implement an operation and maintenance plan, monitor the baghouse pressure drop, and keep monitoring and maintenance records. If the equipment is properly maintained and operated, the opacity standard should be met.

Opacity from a baghouse should not be higher than 5-10%, unless there is some type of malfunction. Typically, baghouses do not slowly degrade. Instead, they have some type of catastrophic failure (e.g., bag break, etc.). Based on engineering judgment, if the baghouse is properly operated and maintained, the opacity should not exceed 10%.

[NOC #1404, Conditions 5 & 6, 10/2/07, as revised on 11/15/19] [WAC 173-401-615(1) & (2), 9/16/02] – portions of this MRRR are gapfilled.

Condition II.C.13: The particulate emission concentration from the baghouse exhaust (including

noncondensable particulate) approved under NOC #1404 shall not exceed 0.01 grains per dry standard cubic foot of exhaust gas. SRCAA may require testing for this limit at any time, including but not limited to, occasions when the opacity limit, specified in Condition II.C.12, is exceeded. [NOC #1404, Condition 7, 10/2/07, as revised on 11/15/19]

MRRR: Because of the general correlation between particulate matter emissions and visible emissions (i.e., visible emissions are an indicator of particulate matter), monitoring focuses on identifying visible emissions. Fiber-Tech must perform weekly inspections during daylight hours for the purpose of identifying visible emissions. Inspections are only required weekly because the baghouse has a consistent compliance history. However, since baghouses tend to have catastrophic breakdowns (i.e., bag breaks, etc.), periodic inspections are important for identifying visible emissions, which are an indicator of problems with the baghouse.

The baghouse has not been source tested for particulate in the past, so there is not an established relationship between particulate emissions and opacity for the units. However, the “no visible emissions” (a.k.a., “smoke / no smoke”) concept is acceptable monitoring for the particulate emission standard because SRCAA is of the opinion that something will be visible before a compliance problem exists.

If visible emissions are observed during an inspection or are otherwise observed, Fiber-Tech is required to take the actions described in the MRRR associated with Condition II.C.1.

In addition, Fiber-Tech must properly operate and maintain the baghouse, prepare and implement an operation and maintenance plan, maintain the pressure drop within the acceptable range, and keep monitoring and maintenance records. If the equipment is properly maintained and operated, the particulate matter emission limit should be met.

Condition II.C.14: Particulate matter spilled or deposited near the baghouse approved under NOC #1404 shall be immediately removed upon discovery. The deposition of particulate matter onto the property of others, or beyond the property line, is prohibited. [NOC #1404, Condition 8, 10/2/07, as revised on 11/15/19]

MRRR: Fiber-Tech is required to properly operate and maintain the baghouse, which includes implementing proper procedures to be used to ensure that particulate emissions are minimized during handling and transfer of particulate collected in the baghouse hopper. [NOC #1404, Conditions 4 & 5, 10/2/07, as revised on 11/15/19]

Condition II.C.15: The exhaust stack for the baghouse shall have a minimum height of 24.5 feet above the ground and shall exhaust vertically. No elbows, tees, or stack caps

that impede the upward, vertical flow of exhaust shall be installed at the end of the stack. [NOC #1404, Condition 9, 10/2/07, as revised on 11/15/19]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition II.C.16: SRCAA shall be notified of any applicable upset conditions, breakdowns, or failures associated with the baghouse approved under NOC #1404. The notification shall occur within 24 hours of the occurrence and in accordance with WAC 173-400-107 and SRCAA Regulation I, Section 6.08. [NOC #1404, Condition 10, 10/2/07, as revised on 11/15/19]

MRRR: No monitoring is required. As with all permit terms, Fiber-Tech must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Certain conditions of the approved Notice of Construction NOC #714 and NOC #1404 are no longer applicable, either because they are one time requirements that have been satisfied, or because of rule changes they are no longer applicable. These conditions are listed below and are not included in Fiber-Tech's operating permit.

CITATION	DESCRIPTION	REASON NOT INCLUDED IN THE PERMIT
NOC #714, Condition #1, 12/18/95	The baghouse is subject to registration with SRCAA since the baghouse is a fine particulate material handling and transfer operation.	This is included in NOC approvals for informational purposes only. A change in Chapter 70A.15 RCW (formerly 70.94), 70A,15 RCW exempts Chapter 173-401 WAC sources from registration.
NOC #714, Condition #8, 12/18/95	SRCAA must be notified at least one week in advance of start-up of the operation.	Notification was received prior to start-up. This is a one-time requirement that has been met.
NOC #714, Condition #9, 12/18/95	SRCAA staff members will perform inspections of the proposed facility at regular intervals. An annual registration fee will be required.	This is included in NOC approvals for informational purposes only. A change in Chapter 70A.15 (formerly 70.94) RCW exempts Chapter 173-401 WAC sources from registration, and therefore registration fees.
NOC #714, Condition #11, 12/18/95	Approval of the Notice of Construction does not relieve the proponent of the obligation to comply with all other applicable federal, state and local regulations and requirements.	This is included in NOC approvals for informational purposes only and is a statement, rather than an applicable requirement.

NOC #714, Condition #13, 12/18/95	The approval shall become void if construction is not commenced within eighteen months.	Construction began within the allowable time.
NOC #1404, Condition 1, 10/2/07	SRCAA must be notified at least one week in advance of start-up of the operation.	Notification was received prior to start-up. This is a one-time requirement that has been met.
NOC #1404, Condition 2, 10/2/07	The approval shall become void if construction is not commenced within eighteen months.	Construction began within the allowable time.
NOC #1404, Condition 1, 6/5/15 as revised 11/15/19	SRCAA must be notified at least one week in advance of start-up date of the modified baghouse.	Notification was received prior to start-up. This is a one-time requirement that has been met.

III. PERMIT SHIELD FINDINGS

This final section of the permit lists regulations for which the facility has requested, and SRCAA proposes to grant, a permit shield per WAC 173-401-640(2). The findings on which this shield is based are given below. These findings are summarized in the permit.

Requirements For Which a Shield Will Be Granted

- 1.PS. Emission Standards for Certain Source Categories [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400- 070, 8/16/18]

Findings: WAC 173-400-070 establishes emission standards for wigwam burners, hog fuel boilers, orchard heating, grain elevators, catalytic cracking units, wood waste burners, sulfuric acid plants, sewage sludge incinerators, and municipal solid waste landfills constructed before 1991. Because Fiber-Tech does not have emission units/sources that fall into any of these categories, the rule does not apply to Fiber-Tech. However, it is applicable if triggered.

- 2.PS. Incineration Burning and Incineration Hours [SRCAA Regulation I, Article VI, Section 6.03, 7/9/20 - STATE/LOCAL ONLY]

Findings: SRCAA Regulation I, Article VI, Section 6.03 applies to incineration units. Because Fiber-Tech does not have any incinerators, the rule does not apply to the Fiber-Tech. However, it is applicable if triggered.

- 3.PS. General Surface Coating [SRCAA Regulation I, Article VI, Section 6.13, 5/6/21 - STATE/LOCAL ONLY]

Findings: SRCAA Regulation I, Article VI, Section 6.13 establishes requirements for sources that perform surface coating. Sections 6.13(F)(1)(b) & (c) exempt fiberglass resin application and gel coat application operations from the rule. Since the present

operations at Fiber-Tech's facility do not involve surface coating operations, the facility is exempt from the Surface Coating Regulation. However, it is applicable if triggered.

4PS. Standards for Control of Particulate Matter on Paved Surfaces [SRCAA Regulation I, Article VI, Section 6.14, 7/9/20]

Findings: SRCAA Regulation I, Article VI, Section 6.14 applies to any government agency of a state, county, city or municipal corporation that applies or contracts for application of sanding materials to or mechanically sweeps or vacuums or contracts for sweeping or vacuuming of paved surfaces within the PM10 Nonattainment area, or within the PM10 maintenance area after the nonattainment area is re-designated to attainment. Since Fiber-Tech is not a governmental agency or municipal corporation, Fiber-Tech is exempt from SRCAA Regulation I, Article VI, Section 6.14.

5PS. Solid Fuel Burning Device Standards [SRCAA Regulation I, Article VIII, 7/10/14]

Findings: SRCAA Regulation I, Article VIII establishes emission standards, certification standards and procedures, curtailment rules, and fuel restrictions for solid fuel burning devices in order to attain the National Ambient Air Quality Standards for fine particulate matter (PM₁₀). Solid fuels (i.e. wood, coal, or any other nongaseous or non-liquid fuels) are not burned at Fiber-Tech. Therefore, Fiber-Tech is exempt from the Solid Fuel Burning Device Standards. However, it is applicable if triggered.

6PS. Emission Standards for Incineration Units [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400- 050(2), 8/16/18]

Findings: WAC 173-400-050(2) applies to emissions from incineration units. Because Fiber-Tech does not have any incineration units, the rule does not apply to the Fiber-Tech. However, it is applicable if triggered.

Requirements For Which a Shield Will Not Be Granted

Sulfur Dioxide – [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400- 040(7), 8/16/18]

Findings: WAC 173-400-040(7) establishes an emission limit of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, based on the average of any period of sixty consecutive minutes. Fiber-Tech operates twelve natural gas fired ambient air heating units at the facility. The twelve heating units are considered insignificant emission units, per WAC 173-401-533(2)(e). Although the insignificant emission units at Fiber-Tech are not required to conduct Monitoring, Recordkeeping, and Reporting requirements, insignificant emission units are subject to the generally applicable requirements. Therefore, SRCAA cannot grant a permit shield for this requirement. WAC 173-400-040(7) applies to the heating units at the facility and is contained in Condition II.A.11 of this permit.

Emission standards for combustion and incineration units – [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400- 050(1), 8/16/18]

Findings: WAC 173-400-050(1) establishes an emission limit of 0.1 gr/dscf at standard conditions for combustion and incineration units. Fiber-Tech operates twelve natural gas fired ambient air heating units at the facility. The twelve heating units are considered insignificant emission units, per WAC 173-401-533(2)(e). Although the insignificant emission units at Fiber-Tech are not required to conduct Monitoring, Recordkeeping, and Reporting requirements, insignificant emission units are subject to the generally applicable requirements. Therefore, SRCAA cannot grant a permit shield for this requirement. WAC 173-400-050(1) applies to the heating units at the facility and is contained in Condition II.A.9 of this permit.

Open Burning – [SRCAA Regulation I, Section 6.01, 7/9/20, STATE/LOCAL ONLY]

Findings: SRCAA Regulation I, Section 6.01 contains requirements related to open burning in Spokane County. While Fiber-Tech does not engage in open burning activities as a normal practice, there is nothing that would prevent Fiber-Tech from engaging in burning activities. For this reason, the provisions of SRCAA Regulation I, Section 6.01 are contained in the standard terms and conditions of all air operating permits (see Condition II.A.14 of this permit). Therefore, SRCAA cannot grant a permit shield for this requirement.

Particulate Matter and Preventing Particulate Matter from Becoming Airborne– [SRCAA Regulation I, Section 6.05, 7/9/20]

Findings: SRCAA Regulation I, Section 6.05 contains particulate matter requirements that apply in Spokane County. Fiber-Tech engages in particulate matter handling operations (wood working activities, etc.) and operates two baghouses at the facility. Therefore, the provisions of SRCAA Regulation I, Section 6.05 apply. SRCAA cannot grant a permit shield for this requirement. The requirements of SRCAA Regulation I, Section 6.05 are contained in Condition II.A.5 of this permit.

Asbestos Control Standards – [SRCAA Regulation I, Article IX, 5/1/14 – STATE/LOCAL ONLY]

Findings: SRCAA Regulation I, Article IX contains requirements to control asbestos emissions from asbestos removal and demolition projects. While Fiber-Tech does not use asbestos in the process or equipment, there may be asbestos in the building. If Fiber-Tech does any demolition or renovation projects at the facility, the requirements of SRCAA Regulation I, Article IX will be triggered. SRCAA cannot grant a permit shield for this requirement. The requirements of SRCAA Regulation I, Article IX are contained in Condition I.G.3 of this permit and are applicable when triggered.

Accidental Release Provisions – [40 CFR Part 68]

Findings: 40 CFR Part 68 contains requirements regarding the accidental release of hazardous materials. While Fiber-Tech currently does not use the materials subject to

the regulation, except in uses exempted in 40 CFR §68.126, there is nothing that would prevent Fiber-Tech from using materials subject to the regulation. For this reason, SRCAA has put the provisions of 40 CFR Part 68 in the standard terms and conditions of all air operating permits (see Condition I.G.5 of this permit). Therefore, SRCAA cannot grant a permit shield for this requirement.

Handling of Chlorofluorocarbons (CFCs) – [40 CFR Part 82]

Findings: 40 CFR Part 82 contains requirements regarding the handling of CFCs. While Fiber-Tech currently handled CFCs in uses exempted in 40 CFR does not handle CFCs in quantities subject to the regulation, except in uses exempted in 40 CFR §82.70 a.2, there is nothing that would prevent Fiber-Tech from handling CFCs subject to the regulation. For this reason, SRCAA has put the provisions of 40 CFR Part 82 in the standard terms and conditions of all air operating permits (see Condition II.A.15 of this permit). Therefore, SRCAA cannot grant a permit shield for this requirement.

APPENDIX A – Summary of major changes made to permit since last version

The following changes were made to the Air Operating Permit for Fiber-Tech since it was last issued on April 29, 2013:

NOC Revisions:

- NOC #1404, was revised by SRCAA on November 15, 2019 (revised requirements incorporated into AOP).

New and revised SRCAA regulations:

- Revised requirements incorporated from SRCAA Regulation I, filed July 9, 2020

New and revised state regulations:

- Revised requirements incorporated from Chapter 173-400 WAC, filed 8/16/18, including new sections related to excess emissions

Miscellaneous revisions:

- Re-numbering of requirements to accommodate new and removed requirement
- Editorial revisions to improve clarity and readability
- New citations for re-codification of Washington Clean Air Act

PREPARED BY: _____
April Westby

DATE: _____

This Statement of Basis and the Operating Permit to which it applies have been reviewed by:

_____, P.E.
Joe Southwell, P.E.

DATE: _____

Scott Windsor, Control Officer

DATE: _____