



## Air Operating Permit

Issued in accordance with:  
40 CFR Part 70, Chapter 70A.15  
RCW (formerly 70.94), and Chapter  
173-401 WAC

**1610 S Technology Blvd., Suite 101, Spokane, WA 99224 (509) 477-4727**

PERMIT NO: AOP-10 - Renewal #3

ISSUANCE DATE: {DRAFT}

EXPIRATION DATE: {DRAFT}

PERMITTEE: Fiber-Tech Industries, Inc.  
3808 N. Sullivan Road, Building 31  
Spokane, WA 99216

FACILITY LOCATION: Fiber-Tech Industries, Inc.  
3808 N. Sullivan Road, Building 31  
Spokane, WA 99216

FACILITY DESCRIPTION: Fiberglass reinforced plywood manufacturing operation

PRIMARY SIC: 3083 - Laminated Plastics Plate, Sheet, and Profile Shapes

PRIMARY NAIC: 32613 - Laminated Plastics Plate, Sheet, and Shape Manufacturing

AIRS AFS NO: WA-063-00087

RESPONSIBLE OFFICIAL WHO SUBMITTED APPLICATION: Robert Pfeifer  
VP of Technology

FACILITY CONTACT/DULY AUTHORIZED REPRESENTATIVE: Brent Gilliam  
Plant Manager  
(509) 960-6184

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Scott Windsor, Executive Director

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## LIST OF ABBREVIATIONS

BACT	Best available control technology
CFR	Code of Federal Regulations
CO	Carbon monoxide
COM	Continuous opacity monitor
COMS	Continuous opacity monitoring system
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 I of FCAA
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NO <sub>x</sub>	Oxides of nitrogen
O <sub>2</sub>	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM10	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 <sub>2</sub>	Sulfur dioxide
SO <sub>x</sub>	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

## DEFINITIONS OF WORDS & 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), 2/3/16]
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 (formerly 70.94) 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 emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70A.15 RCW (formerly 70.94) [(SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-030(29) (8/25/18)]
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 RCW (formerly 70.94), or 70A.388 RCW (formerly 70.98) [(SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-030(31) (8/25/18)]
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(31) (8/25/18)]
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 emission rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

Until this permit expires, is modified, or revoked, the permittee, Fiber-Tech Industries (Fiber-Tech), is authorized to operate subject to the terms and conditions listed herein.

## I. STANDARD TERMS & CONDITIONS

### A. PERMIT ADMINISTRATION

**I.A.1. Federal Enforceability.** All terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA except those terms or conditions not required under the FCAA or under any of its applicable requirements and specifically so designated. All terms and conditions that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are not enforceable by EPA or citizens under the FCAA. [WAC 173-401-625, 10/4/93]

**I.A.2. Duty to comply.** The permittee shall comply with all terms and conditions of this Chapter 401 permit. Any permit noncompliance shall constitute a violation of Chapter 70A.15 (formerly 70.94 RCW), and for federally enforceable provisions, a violation of the Federal Clean Air Act. Such violations are grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. [WAC 173-401-620(2)(a), 10/4/93]

**I.A.3. Schedule of Compliance.** The permittee will continue to comply with all applicable requirements with which the source is in compliance. The permittee will meet, on a timely basis, any applicable requirements that become effective during the permit term. [WAC 173-401-630(3), 2/3/16]

**I.A.4. Need to Halt or Reduce Activity Not a Defense.** It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b), 10/4/93]

**I.A.5. Permit Actions.** This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c), 10/4/93]

**I.A.6. Reopening for Cause.** The permit shall be reopened and revised under any of the following circumstances:

- a. Additional requirements become applicable to the facility and the remaining permit term is three or more years. Such reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. Such reopening is not required if the effective date of the new requirement is later than the date on which this permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j). (See Condition I.A.15 - Permit Continuation below);
- b. SRCAA or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other

terms or conditions of the permit; or

c. SRCAA or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

[WAC 173-401-730, 10/4/93]

**I.A.7. Emissions Trading.** No permit revision shall be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g), 10/4/93]

**I.A.8. Property Rights.** This 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 shall furnish within a reasonable time to SRCAA, any information that SRCAA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to SRCAA copies of records required to be kept by the permit or, for information claimed confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. SRCAA shall maintain confidentiality of such information in accordance with RCW 70A.15.2510 (formerly 70.94.205). [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, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. [WAC 173-401-500(6), 9/16/02]

**I.A.11. Permit Fees.** The permittee shall pay fees as a condition of this permit in accordance with SRCAA's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70A.15 (formerly 70.94) RCW. [WAC 173-401-620(2)(f), 10/4/93]

**I.A.12. Severability.** If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h), 10/4/93]

**I.A.13. Permit Appeals.** This 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 in addition 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.** This permit shall be in effect for five years from the date of issuance as indicated on the cover page. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete application for renewal is submitted to SRCAA at least 12 months, but no more than 18 months, prior to the date of permit expiration. Upon SRCAA's receipt of a timely and complete application, the facility may continue to operate subject to final action by SRCAA on the application. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit, by the deadline specified in writing by SRCAA, any additional information identified as necessary to process the application. The application shall be sent to:

Director  
Spokane Regional Clean Air Agency  
1610 S Technology Blvd, Suite 101  
Spokane, WA 99224

[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.** This permit and all terms and conditions contained herein, including any permit shield provided under Condition I.A.16 - Permit Shield and Section III. PERMIT SHIELD, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect 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 applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA
- d. The ability of EPA to obtain information from the permittee pursuant to Section 114 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]

(See III. PERMIT SHIELD for requirements that have been deemed inapplicable to this facility.)

## **B. INSPECTION & ENTRY**

**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), or operations regulated or required under this permit;
- d. Enter the facility premises at reasonable times to inspect equipment and/or records specific to the control, recovery, or release of contaminants into the atmosphere, in accordance with SRCAA Regulation I, Article II and RCW 70A.15.2500 (formerly 70.94.200); and
- e. 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 3/22/07, 7/26/07 & 12/8/10] [NOC #1404, Condition 11(12), 10/2/07 as revised on 11/15/19]

Nothing in this condition shall limit 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

**I.C.1. Emergencies.** An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an enforcement action for non-compliance with a technology-based emission limitation if all the conditions of WAC 173-401-645(3) and (4) are met. The permittee is required to submit notification of the emergency to SRCAA in accordance with Condition I.D.7- Prompt Reporting of Deviations, including a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated; and
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

[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)** Until the removal of WAC 173-400-107 from the Washington state 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 Condition I.D.7-Prompt Reporting of Deviations below, and submit a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence. The written report also must include the following:

- a. For excess emissions due to startup or shutdown conditions, the permittee must adequately demonstrate that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.
- b. For excess emissions due to scheduled maintenance, the permittee must adequately demonstrate that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.
- c. For excess emissions due to a malfunction or upset, the permittee must adequately demonstrate that:
  - i. The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
  - ii. The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and
  - iii. 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 emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

After the removal of WAC 173-400-107 from the Washington state 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. The report must adequately demonstrate to SRCAA 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;
- c. When the operator knew or should have known that an emission standard or other permit condition was being exceeded, the operator took immediate and appropriate corrective action in a manner consistent with safety and good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action. Actions taken could include slowing or shutting down the emission unit as necessary to minimize emissions;
- d. If the emitting equipment could not be shutdown during the malfunction or upset to prevent the loss of life, prevent personal injury or severe property damage, or to minimize overall emissions, repairs were made in an expeditious fashion;
- e. All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage;
- f. The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible; and
- g. All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality.

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 the limits The owner or operator of a source which emits pollutant(s) exceeding any limit established by Ecology or the Agency 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 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**

**I.D.1. Records of Required Monitoring Information.** The permittee shall keep records of monitoring information including:

- a. The date; the location of the facility, as defined in this permit; and time of sampling and measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), 9/16/02]

**I.D.2. Permanent Shutdown of an Emission Unit.** If an emission unit is permanently shut down, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emission unit, once any residual requirements have been met. All records, relating to the shut down emission unit, generated while the emission

unit was in operation, shall 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 emission unit, the permittee shall record the date that operation of the emission unit ceased, using a log or file on site. The shutdown date shall 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 emission 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 emission unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

**I.D.4. Records of Changes.** The permittee shall 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 those changes. [WAC 173-401-615(2)(b), 9/16/02]

**I.D.5. Retention of Records.** The permittee shall keep records of all required monitoring data and support information for a period of five years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [WAC 173-401-615(2)(c), 9/16/02]

**I.D.6. Monitoring Reports.** Unless a shorter time period is specified by this permit, reports of any required monitoring shall be submitted 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 deviations from permit requirements shall be clearly identified in such reports. In addition, any permanent emission unit shutdowns shall be reported in accordance with Condition I.D.2- Permanent Shutdown of an Emission Unit, above. The reports shall be certified as required in Condition I.D.10- Report Submittals. Provided, where this permit requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification. [WAC 173-401-615(3)(a), 9/16/02]

**I.D.7. Prompt Reporting of Deviations.** The permittee shall promptly report deviations from permit requirements, including:

- Deviations attributable to upset conditions, as defined in this permit;
- Excess emissions due to emergencies (see Condition I.C.1) and/or scheduled maintenance; and

- Any time a startup, shutdown, breakdown, or upset condition occurs which resulted in excess emissions or could result in an emissions violation or a violation of an ambient air quality standard.

Reports of deviations shall include the probable cause of such deviations, and any corrective actions or preventative measure taken. Prompt means reporting according to the shortest time period, which applies to the situation, as listed below:

- a. In the case where the deviation represents a potential threat to human health or safety, the deviation shall be reported by phone or facsimile as soon as possible, but no later than 12 hours after the deviation is discovered;
- b. In the case where an affirmative defense is sought under Condition I.C.1-Emergencies, Condition I.C.2 and I.C.3-Excess Emissions and/or Condition I.C.4-Report of Breakdown for State/Local Only Requirements in SRCAA Regulation I, and in the case where an unplanned condition, such as a breakdown or upset occurs, which could result in an emissions violation or violation of an ambient air quality standard, the deviation shall be reported by phone or facsimile as soon as possible, but no later than the end of the next working day; and
- c. For all other deviations, the deviation shall be reported as part of the next monitoring report, or no later than 30 days after the end of the month during which the deviation is discovered, whichever is sooner.

The permittee shall maintain a contemporaneous record of all deviations.

[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. Emission Inventory.** The permittee shall submit an inventory of emissions from the source each year. The inventory shall include stack and fugitive emissions of particulate matter, PM<sub>10</sub>, PM<sub>2.5</sub>, sulfur dioxide, carbon monoxide, total reduced sulfur compounds, fluorides, lead, volatile organic compounds, and other contaminants. Sources must provide registration information in a manner prescribed by SRCAA for the submittal of these inventories. When the permitting authority requests emission inventory information for a calendar year, the permittee must submit the emissions inventory no later than April 15th after the end of the calendar year for which the emissions inventory was requested. If April 15th falls on a weekend, then the deadline to file shall be the next business day. The permittee must maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. The permittee may base emission estimates used in the inventory on the most recent published EPA emission factors for a source category, or other information available to the owner and operator, whichever is the better estimate. [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. Insignificant Emission Units.** Emission units or activities, which qualify as insignificant solely on the basis of WAC 173-401-530(1)(a), shall not exceed the emissions thresholds

specified in WAC 173-401-530(4), until this permit is modified pursuant to WAC 173-401-725. Upon request from SRCAA, the permittee shall demonstrate that the actual emissions of such a unit or activity are below the applicable emission thresholds. SRCAA shall include in its request a deadline by which the permittee shall submit the emissions data. [WAC 173-401-530(6), 9/16/02]

**I.D.10. Report Submittals.** All application forms, reports, and compliance certifications required in this permit shall be submitted to:

Director  
Spokane Regional Clean Air Agency  
1610 S Technology Blvd, Suite 101  
Spokane, WA 99224

All such application forms, reports, and compliance certifications must be certified by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the report are true, accurate and complete. [WAC 173-401-520, 10/4/93]

**I.D.11. Rendering Device or Method Inaccurate.** The permittee shall 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**

**I.E.1. Compliance Certification Submittals.** The permittee shall submit compliance certifications once per year to SRCAA in accordance with Condition I.D.10 - Report Submittals. The compliance certification shall be submitted no later than one hundred and five days after the end of the calendar year for which certification is being made. For emission units not in compliance with terms and conditions of this permit, SRCAA may require more frequent submission of compliance certifications. Additionally, where specified in an applicable requirement, more frequent compliance certifications shall be submitted. [WAC 173-401-630(5)(a), 2/3/16]

**I.E.2. Compliance Certification Contents.** The compliance certification shall include:

- a. The identification of each term or condition of the permit that is the basis of the certification;
- b. The compliance status;
- c. Whether compliance was continuous or intermittent;
- d. The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615(3)(a) (see Condition I.D.6 - Monitoring Reports above); and
- e. Such other facts as SRCAA may, in writing, require from the permittee to determine the compliance status of the source.

Where a permit does not require testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. Where a permit requires testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance when the testing, monitoring, recordkeeping required by the permit revealed no violations during the period, and there were no observed, documented, or known instances of noncompliance during the reporting period. [WAC 173-401-630(5)(c), 2/3/16] [WAC 173-401-530(c), 9/16/02]

**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.** The permittee shall submit a copy of all compliance certifications to the Administrator, no later than one hundred and five days after the end of the calendar year for which certification is being made, at the following address:

Administrator  
USEPA  
MS OAQ-107  
1200 Sixth Avenue  
Seattle, WA 98101

[WAC 173-401-630(5)(d), 2/3/16]

## **F. TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS & TREATMENT OF DOCUMENTS**

**I.F.1. False Information.** The permittee shall 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, Section 2.08.A & 2.08.E, 7/9/20] In addition, the permittee shall not willfully make a false or misleading statement to the Board of Directors of SRCAA or their authorized representatives as to any matter within the jurisdiction of the Board. [SRCAA Regulation I, 2.08.A, 7/9/20 - STATE/LOCAL ONLY]

**I.F.2. Alteration of Documents.** The permittee shall not reproduce or alter or cause to be reproduced or altered any order or other paper issued by SRCAA if the purpose of such reproduction or alteration is to evade or violate any provision of SRCAA Regulation I or any other law. [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 shall be available on the premises designated by the order. [SRCAA Regulation I, 2.08.C, 7/9/20 - STATE/LOCAL ONLY]

**I.F.4. Posting of Notices.** A notice shall be posted when SRCAA requires one to be displayed. The permittee shall not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA Board of Directors. [SRCAA Regulation I, 2.08.D7/9/20 - STATE/LOCAL ONLY]

## **G. APPLICABLE WHEN TRIGGERED REQUIREMENTS**

The following conditions summarize requirements that apply if the permittee undertakes the activities specified in the requirement or proposes changes to the source that trigger the applicability of the requirement. The permit does not require monitoring for compliance with the requirements, but the compliance certification required by Condition I.E.1 - Compliance Certification Submittals shall describe the permittee's compliance with these 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.** A permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR §68.130, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR Part 68 no later than the latest of the following dates:

- a. Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR §68.130; or
- b. 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.** The permittee shall comply with the applicable requirements given in Chapter 173-441 WAC related to the reporting of emissions of greenhouse gases. [ WAC 173-441, 9/15/16– STATE/LOCAL ONLY]

## **II. EMISSION LIMITATIONS & MONITORING AND REPORTING REQUIREMENTS**

This section contains emission limitations and emission related requirements including general requirements that apply facility-wide and requirements specific to individual, or groups of, emission units. 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 MRRR are given at the end of this section.

Some facility-wide requirements may be repeated in emission limitation tables for individual emission units or groups of emission units if additional monitoring is required for that emission unit or group of emission units. Facility-wide requirements apply to all emission units regardless of whether they are listed in every emission limitations table unless otherwise exempted in III. PERMIT SHIELD.

### **A. FACILITY-WIDE EMISSION LIMITATIONS**

TABLE II.A-3 lists the applicable emission limitations that apply facility-wide. These facility-wide emission limitations apply to all significant and insignificant emissions units at the facility, given in Table II.A-1 and Table II.A-2. 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.

The facility-wide emission limitations, given in Table II.A-3, apply to insignificant emissions units. However, the monitoring, recordkeeping and reporting requirements given in II.D. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS and in I.D. GENERAL

MONITORING, RECORDKEEPING, & REPORTING 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. The permittee is required to certify compliance with the facility-wide emission limitations for insignificant emission units. [WAC 173-401-530(2)(c) & (d), 9/16/02]

TABLE II.A-1 – Significant Emission Units

Emission Point # (as listed in the permit application)	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 exhaust fans 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 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 emissions 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>
#1-4 – 4A	<p>Trim / Sizing, Leroy saw in Bldg. #31</p>	<p>Torit Model 49PJD10 baghouse on south side of Bldg. #31 (6,000 scfm) – NOC #714</p>
#1-4-4B	<p>Panel Sizing / Trim, Table saw, 2 Rodgers saws, Sigma Beam saw in Bldg. #31</p>	<p>Torit Model 49PJD10 baghouse (7,092 scfm) – NOC #1404</p>

TABLE II.A-2 – Insignificant Emission Units (IEUs)

<u>IEU Description</u>	<u>Basis / Justification for IEU Designation</u>
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)

TABLE II.A-3 - Facility-Wide Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.A.1	SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(1)(c) (8/16/18)	All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040(1)(c)			No MRRR Required
II.A.2	SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(2) (8/16/18)	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.	ECOLOGY Method 9A (September 20, 2004)	3 minute aggregate in any 1 hour period	1M
II.A.3	SRCAA Regulation I, 6.02, 7/9/20- STATE/LOCAL ONLY	Visible Emissions shall not equal or exceed 20%, as specified in SRCAA Regulation I, Section 6.02 - STATE/LOCAL ONLY	ECOLOGY Method 9A (September 20, 2004)	3 minute aggregate in any 1 hour period	1M
II.A.4	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	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.			2M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	SRCAA Regulation I, Section 6.05.A, 7/9/20 – STATE/LOCAL ONLY				
II.A.5	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	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 specified in WAC 173-400-040(4)(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.  Examples of reasonable precautions are provided in Condition 2M.			2M
II.A.6	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	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			2M
II.A.7	SRCAA Regulation I, Section 6.04, 7/9/20  NOTE – SRCAA Regulation I, Section 6.04(D) through (G) are STATE/LOCAL	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:			2M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	ONLY	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			
II.A.8	SRCAA Regulation I, 6.07, 7/9/20-	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			No MRRR required
II.A.9	SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-050(1) & (3) (8/16/18)	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).	RM 5 (2010) or procedures in WAC 173-400-050 approved per Condition I.G.4 - Source Testing	average of three one-hour tests	No MRRR required
II.A.10	SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-060 (10/25/18)	Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060	RM 5 (2010) or procedures in WAC 173-400-060 approved per Condition I.G.4 - Source Testing	average of three one-hour tests	1M
II.A.11	SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(7) (8/16/18)	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). -	Procedures in SRCAA Regulation I, Section 2.09 approved per Condition I.G.4 - Source Testing	any period of 60 consecutive minutes	No MRRR required

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.A.12	SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-200 (3/22/91)	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.			No MRRR required
II.A.13	SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-205 (3/22/91)	No varying of emissions according to atmospheric conditions or ambient concentrations except as allowed under WAC 173-400-205.			No MRRR required
II.A.14	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	No outdoor burning, except as allowed under Chapter 173-425 WAC and/or Regulation I of SRCAA, Section 6.01			No MRRR required
II.A.15	40 CFR Part 82, 4/10/2020	Handling and use of ozone-depleting substances must be in accord with 40 CFR Part 82.			No MRRR required

**B. GEL COAT AND FIBERGLASS LAMINATION EMISSION LIMITATIONS**

This section of the permit covers Gel Coat and Fiberglass Lamination activities performed at the site. The equipment/activities covered are listed in Table II.B-1.

Table II.B-1 – Gel Coat & Fiberglass Lamination Emission Units/Activities

Emission Unit Number Used in Permit Application (Process # - Discharge #)	Description	Air Pollution Control Equipment
#1-2 – 2	Gel Coat Application and Curing Processes (NOC #706)  Gel Coat curing emissions are uncontrolled and exhausted via a system of 4 exhaust fans on the north side of Bldg. #31.	A filtered collection hood collects emissions from the gel coat application process and exhausts through a stack.
#1-3 - 3	Fiberglass Resin Lamination Operation (resin application and curing) (NOC #706)  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.	Uncontrolled; no air pollution control equipment.

Table II.B-2 provides the applicable requirements for the emission units listed in Table II.B-1. Table II.B-2 includes the requirements given in 40 CFR Part 63, Subpart WWWW, “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production” that apply to Fiber-Tech Industries. 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. Table II.B-2 also contains the requirements from 40 CFR 63, Subpart A, “General Provisions” that apply to Fiber-Tech. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are not enforceable by EPA or citizens under the FCAA.

Table II.B-2 – Gel Coat & Fiberglass Lamination Emission Limitations

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.B.1	NOC #706, Condition #5, 9/5/01 as revised on 12/8/10	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.)			3M
II.B.2	NOC #706, Condition #6, 9/5/01 as revised on 12/8/10	<ul style="list-style-type: none"> <li>•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.</li> <li>•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.</li> </ul>			No MRRR required
II.B.3	NOC #706, Condition #11, 9/5/01 as revised on 12/8/10	Visible emissions from any process stack, including the four north side fan stacks, shall not exceed 10% opacity during any six-minute average.	EPA RM 9	6 minute average	1M, 3M
II.B.4	NOC #706, Condition #7, 9/5/01 as revised on 12/8/10	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.			1M, 3M
II.B.5	NOC #706, Condition #8, 9/5/01 as revised on 12/8/10	Fiber-Tech shall use the gelcoat application equipment installed in 2006 or another SRCAA approved application method.			3M
II.B.6	NOC #706, Condition #9, 9/5/01 as revised on 12/8/10	The use of Methylene Chloride is prohibited in any operation at the facility.			No MRRR Required
II.B.7	NOC #706,	Total VOCs and styrene			4M



	Condition #3, 9/5/01 as revised on 12/8/10	emissions shall not exceed 81.4 tons per calendar year.			
II.B.8	NOC #706, Condition #12, 9/5/01 as revised on 12/8/10	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.			2M
II.B.9	NOC #706, Condition #14, 9/5/01 as revised on 12/8/10	Spills of materials containing (VOC) or volatile TAPs shall be cleaned up upon discovery, and the waste shall be stored in closed containers.			2M
II.B.10	NOC #706, Condition #2, 9/5/01 as revised on 12/8/10	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.			No MRRR required
II.B.11	SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.4(b), 2002  NOC #706, Condition #10, 9/5/01 as revised on 3/22/07, 7/26/07, and 12/8/10	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			No MRRR Required
II.B.12	SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.6(e) and §63.5835(c), 4/20/06  NOC #706, Condition #10, 9/5/01 as revised on 12/8/10	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.			3M
II.B.13	SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts	The open molding and repair operations shall meet the applicable annual average			5M, 6M, 7M, 8M

	<p>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.</p> <p>NOC #706, Condition #10, 9/5/01 as revised on 12/8/10</p>	<p>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.</p>			
II.B.14	<p>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; and §63.5900(c), 3/20/20.</p> <p>NOC #706, Condition #10, 9/5/01 as revised on 12/8/10</p>	<p>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</p>			7M, 8M
II.B.15	<p>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; and §63.5900(c), 3/20/20.</p> <p>NOC #706, Condition #10 and 13, 9/5/01 as revised on 12/8/10</p>	<p>The permittee must keep containers that store process materials (resins, styrene, gelcoat, solvents, waste materials, shop towels, etc.) containing VOCs, HAPs, and/or volatile TAPs- closed or covered except during the addition or removal of materials. Bulk HAP-containing storage tanks may be vented as necessary for safety. No solvents containing VOCs or volatile TAPs shall be disposed of by allowing them to evaporate.</p>			7M, 8M

II.B.16	<p>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; and §63.5900(c), 3/20/20.</p> <p>NOC #706, Condition #10, 9/5/01 as revised on 12/8/10</p>	<p>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.</p> <p>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.</p>			7M, 8M
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**C. WOOD WORKING/DUST COLLECTION EMISSION LIMITATIONS**

This section of the permit covers Wood Working/Dust Collection activities performed at the site. The equipment/activities covered are listed in Table II.C-1.

Table II.C-1 – Wood Working/Dust Collection Emission Units/Activities

Emission Unit Number Used in Permit Application (Process # - Discharge #)	Description	Air Pollution Control Equipment
#1-4 – 4A	Trim / Sizing Leroy saw in Bldg. #31	Baghouse #1 - 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	Baghouse #2 -Torit Model 49PJD10 baghouse (7,092 scfm) – NOC #1404

Table II.C-2 provides the applicable requirements for the emission units listed in Table II.C-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are not enforceable by EPA or citizens under the FCAA.

Table II.C-2 – Wood Working/Dust Collection Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.C.1	NOC #714, Condition 2, 12/18/95	#1-4 – 4A: Particulate matter emissions from the baghouse shall not exceed 0.01 grains per dry standard cubic foot of exhaust flow.	RM 5 (2012)	average of three one hour tests	1M, 9M
II.C.2	NOC #714, Condition 3, 12/18/95	#1-4 – 4A: The baghouse shall be maintained in good operating condition.			9M
II.C.3	NOC #714, Condition 4, 12/18/95	#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.			9M
II.C.4	NOC #714, Condition 5, 12/18/95	#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.			9M
II.C.5	NOC #714, Condition 6, 12/18/95	#1-4 – 4A: Visible emissions from the load out area, baghouse exhaust, and collection bin vents shall not exceed 5%.	EPA RM 9 (2009)	3 minute aggregate in any 1 hour period	1M, 9M
II.C.6	NOC #714, Condition 7, 12/18/95	#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.			9M

II.C.7	NOC #714, Condition 10, 12/18/95	#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.			No MRRR required
II.C.8	NOC #714, Condition 12, 12/18/95	#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).			9M
II.C.9	NOC #1404, Condition 2, 10/2/07 as revised on 11/15/19	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.			No MRRR required
II.C.10	NOC #1404, Condition 3, 10/2/07 as revised on 11/15/19	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.			No MRRR required
II.C.11	NOC #1404, Condition 4, 10/2/07 as revised on 11/15/19	The baghouse approved under NOC #1404 shall be maintained in good operating condition.			10M
II.C.12	NOC #1404, Condition 6, 10/2/07 as revised on 11/15/19	Visible emissions from the baghouse exhaust approved under NOC #1404 shall not exceed 10%.	EPA RM 9 (2009)	6-minute average	1M, 10M
II.C.13	NOC #1404, Condition 7, 10/2/07 as revised on 11/15/19	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.	EPA RM 5 and 202 (2012)	average of three one hour tests	1M, 10M
II.C.14	NOC #1404, Condition 8, 10/2/07	Particulate matter spilled or deposited near the baghouse			10M

	as revised on 11/15/19	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.			
II.C.15	NOC #1404, Condition 9, 10/2/07 as revised on 11/15/19	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.			No MRRR required
II.C.16	NOC #1404, Condition 10, 10/2/07 as revised on 11/15/19	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.			No MRRR required

**D. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS**

**1M.** The permittee shall meet the requirements given in a) and if triggered, the permittee shall meet the requirements given in b) and/or c).

- a) The permittee shall 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 and/or particulate standards. 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) and, if a particulate matter standard applies, testing according to c) 2).
- 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.
  - 2) As a means of demonstrating compliance with PM emission limit(s), the permittee shall

perform, or have performed, RM 5 (July 1, 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.

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.

[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.

**2M.** The permittee shall meet the requirements given in a) and b), and if triggered, the permittee shall meet the requirements given in c).

- a) The permittee shall perform weekly inspections of the facility during daylight hours while the facility is in operation to verify that each requirement for which this MRRR is specified in the "MRRR Reference" column in the above tables is being met. For permit conditions that require that reasonable precautions be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, see 2M.d) below. 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.
- b) The permittee shall record and investigate complaints received regarding air quality problems. Complaints shall be investigated as soon as possible, but no later than 8 hours of receipt or by the end of the first regular business day during which the complaint was received, whichever is later. Receipt of a complaint does not, in and of itself, establish a violation. For permit conditions that require that reasonable precautions be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, see 2M.d) below. Records shall be kept of each complaint investigation, including the date and time that the complaint was received, the date and time of the complaint investigation, and observations made during the investigation. 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.
- c) If potential violations of the requirement(s) are observed during the weekly inspections, as part of the complaint investigation, and/or at any other time, the permittee shall take timely and appropriate corrective action. Action shall be considered timely and appropriate if the problem is solved as soon as possible, but no later than 24 hours of first observing the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the requirement to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records



shall be kept of all correction action(s) taken by the permittee. 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.

- d) The following are considered to be reasonable precautions; recognized good practices and procedures; and effective control apparatus and measures. Depending on the air quality problem being addressed, it may be necessary to implement one, several, or all of the precautions, practices, and procedures.
- i. Reasonable precautions to prevent PM or fugitive dust from becoming airborne include, but are not limited to:
- A. Using water or chemical dust suppressants on PM containing materials prior to and during activities that may release PM into the air. Re-application may be required periodically to maintain effectiveness;
  - B. Minimizing activity during high winds, if the winds are likely to cause the release of PM into the air;
  - C. Using covered chutes, covered containers, and/or PM collection and control equipment when handling, transferring, and/or storing PM containing materials;
  - D. Minimizing the free fall distance, i.e., drop height, of PM containing materials at transfer points such as the end of conveyors, front end loader buckets, loading spouts, etc...
  - E. Maintaining adequate freeboard and/or covering loads when transporting PM containing material;
  - F. Minimizing exposed areas of PM containing materials such as storage piles, graded surfaces, etc... and/or using tarps, chemical dust suppressants, vegetation, etc.. to minimize releases to air;
  - G. Keeping paved surfaces clean to minimize re-entrainment of PM into the ambient air; and/or
  - H. Limit vehicle speed to less than 15 miles per hour on unpaved areas.
- ii. Reasonable precautions to prevent tracking of PM onto paved public roadways include, but are not limited to:
- A. Paving unpaved traveled surfaces;
  - B. Gravelling unpaved traveled surfaces. Gravel may need to be reapplied periodically to maintain effectiveness;
  - C. Paving or installing quarry spalls<sup>1</sup> at exit aprons;

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<sup>1</sup> A quarry spall, aka rock entrance, is a buffer area consisting of very large aggregate, usually 4 to 8 inch crushed rock, which jars material free from tires and undercarriages.

- D. Cleaning vehicle tires and undercarriages before exiting to paved public roadways; and/or
  - E. Promptly cleaning material that has been tracked out onto paved public roadways.
- iii. Reasonable precautions to prevent release of air contaminants, other than PM, include, but are not limited to:
- A. Using materials that decrease air contaminant emissions to the air, e.g., low-VOC materials and/or water based materials;
  - B. Using solvent containing materials with lower vapor pressures;
  - C. Keeping unused or partially used containers of organic solvent containing materials closed, except when in use;
  - D. Cleaning up all spills of organic solvent containing materials upon discovery and keeping the waste materials in closed containers; and/or
  - E. Keeping all disposable materials which contain organic solvents in closed containers.
- iv. Recognized good practices and procedures and effective control apparatus and measures to reduce odors include, but are not limited to:
- A. Keeping odorous materials in closed containers or confined within a building;
  - B. Using ventilation systems which direct odor bearing gases away from neighboring residences and businesses;
  - C. Using scrubbers or other add-on control equipment to control odors;
  - D. Using materials which release less odorous compounds;
  - E. Disposing of odorous, or potentially odorous, materials promptly; and/or
  - F. Operating and maintaining equipment and processes in a manner that minimizes odors.

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

**3M.** 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.

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

**4M.** 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:

- 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]

**5M.** The permittee must use one of the following methods in paragraphs (a) through (d) below to meet the HAP emissions limits given in Condition II.B.13. To comply with the emission limits given in Condition II.B.13, the permittee may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, and employing covered curing techniques.

- 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.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5810, 8/25/05; §63.5840, 8/25/05; and §63.5860, 8/25/05]

**6M.** The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used, if the permittee is averaging organic HAP contents (i.e., using options (b) or (c) in Condition 5M) to demonstrate compliance with the organic HAP emissions limits given in Condition II.B.13. Resin and gel coat use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on Material Safety Data Sheets (MSDS) or on resin specifications supplied by the resin supplier. If the permittee can demonstrate that all resins and gel coats individually meet the applicable organic HAP emissions limits, or organic HAP content limits, (i.e., using options (a) or (d) in Condition 5M) then resin and gel coat use records are not required.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5895, 3/20/20]

**7M.** The permittee must submit a compliance report to EPA Region 10 and SRCAA by July 30 every year to cover the period from January 1 – June 30 and April 15 every year to cover the period from July 1 – December 31. Each compliance report must contain the following:

- a) Company name and address;
- b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c) Date of the report and beginning and ending dates of the reporting period;
- d) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards given in Conditions II.B.15 - 19, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period; and
- e) For each deviation from an organic HAP emissions limitation or operating limit and for each deviation from the requirements for work practice standards that occurs, the compliance report must contain the total operating time of each affected source during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.5910, 3/20/20 and §63.5900, 3/20/20]

**8M.** The following records shall be kept in accordance with Condition I.D.5 - Retention of Records and 40 CFR § 63.10(b)(1), as applicable, and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives:

- a) A copy of each notification and report that the permittee submitted to comply with 40 CFR 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in §63.10(b)(2)(xiv);
- b) All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents, including the information required in Condition 6M;

- c) A certified statement that the permittee is in compliance with the work practice requirements given in Conditions II.B.15 - 16.

As specified in 40 CFR § 63.10(b)(1), each record must be kept for 5 years following the date of each occurrence, measurement, corrective action, report, or record. Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept off-site for the remaining 3 years. Records may be kept in hard copy or computer readable form, including but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

[SRCAA Regulation I, Section 2.18(A), 7/9/20 which adopts by reference 40 CFR §63.10(b)(1) and (b)(2)(xiv), 4/20/06; §63.5915, 3/20/20; and §63.5920, 3/20/20]

**9M.** Proper operation and maintenance of the baghouse and load-out area approved under NOC #714 shall include, but is not limited to:

- 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 shall develop and follow an operation and maintenance plan that includes, at a minimum, items a) through d) above.

Monitoring shall include 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 the permittee from the obligation to report any permit deviations as required in Condition I.D.7 – Prompt Reporting of Deviations.

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. 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]

**10M.** An operation and maintenance (O&M) plan shall be developed 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 followed. 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 shall 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]

### **III. PERMIT SHIELD**

#### **A. INAPPLICABLE REQUIREMENTS**

The requirements listed in this section do not apply to the source, or to the specific emission units specified below, provided that such applicable requirements are included in and specifically identified in the permit. The permit shield applies to all requirements so identified. Citations to 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. [WAC 173-401-640(2), 10/4/93]

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

- 2.PS. **Incineration Burning and Incineration Hours:** 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. [SRCAA Regulation I, Article VI, Section 6.03, 7/9/20 - STATE/LOCAL ONLY]
- 3.PS. **General Surface Coating:** 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 SRCAA's surface coating regulation. However, it is applicable if triggered. [SRCAA Regulation I, Article VI, Section 6.13, 5/6/21 - STATE/LOCAL ONLY]
- 4.PS. **Standards for Control of Particulate Matter on Paved Surfaces:** 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 redesignated 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. [SRCAA Regulation I, Article VI, Section 6.14, 7/9/20 ]
- 5.PS. **Solid Fuel Burning Device Standards:** 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 (PM<sub>10</sub>). 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. [SRCAA Regulation I, Article VIII, 7/10/14 -]
- 6.PS. **Emission Standards for Incineration Units:** 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. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-050(2), (8/16/18)]