

**Bay Area Air Quality Management District**

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**Permit Evaluation  
and  
Statement of Basis  
for  
MAJOR FACILITY REVIEW PERMIT RENEWAL**

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

**Facility Address:**  
1555 Copperhill Parkway  
Santa Rosa, CA 95403

**Mailing Address:**  
1555 Copperhill Parkway  
Santa Rosa, CA 95403

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## **Title V Statement of Basis for Renewal**

### **A. Background**

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the “potential to emit,” as defined by BAAQMD Regulation 2-6-218, more than 10 tons per year of styrene, which is a hazardous air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility number that consists of a letter and a 4-digit number. This facility number is also considered to be the identifier for the permit.

This facility received its initial Title V permit on July 1, 1997. This application is for a permit renewal. Although the current permit expired on July 1, 2002, it continues in force until the District takes final action on the permit renewal. The standard sections of the permit have changed since July 1, 1997. The proposed permit shows all changes to the permit in strikeout/underline format.

### **B. Facility Description**

Western Fiberglass, Inc. manufactures corrosive resistant tanks and other containment devices for secondary containment of hazardous materials. The tanks are made from reinforced plastic composites. Emissions of the facility are primarily volatile organic compounds (VOC). Styrene, which is both a volatile organic compound and a hazardous air pollutant, is the main pollutant.

Reinforced plastic composites consist of a mixture of fibrous reinforcement that provides strength and a plastic matrix that binds and protects the reinforcement. Composites are formed (laid up) in molds as laminates (layers of matrix and reinforcement) or cast in molds as homogeneous mixtures. Fiberglass is used as reinforcement material. Reinforcement may be incorporated into or within products in three forms: as randomly oriented chopped fibers, woven cloth, or fiber bundles (roving). Plastic matrix is formed from the curing (chemical reaction) of

the liquid resin mixture, which contains a blend of resins (unconnected plastic subunits), monomers (connecting links between the subunits), and various agents that promote curing and affect the properties of the resin mix. Fillers may also be added to a resin mix to improve the fire rating or other physical characteristics. During the curing process, the resins polymerize (connect through monomer cross-linkage) to form a tough solid plastic.

The facility uses has three permitted sources for their reinforced plastic composite operation: filament winding, forming in closed molds, and chopper gun. The chopper gun is use to form composites (lay up) in molds as laminates. Composites are also formed in the closed molds. The filament winding operation wraps a thermoset resin-impregnated glass reinforcement around a suitable mandrel (spindle or rod). The mandrel gives the shape of the final item. A filament-winding machine wraps the mandrel with resin-impregnated strands with the required amount and orientation to build the designed reinforced structure. Filament winding produces hollow items like tubes, pipes, elbows, and tanks.

### **C. Permit Content**

The legal and factual basis for the permit follows. The permit sections are described in the order that they are presented in the permit.

#### **I. Standard Conditions**

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

Condition I.J has been added to clarify that the capacity limits shown in Table II-A are enforceable limits.

#### **II. Equipment**

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that have a potential to emit of more than 2 tons of a "regulated air pollutant," as defined in BAAQMD Rule 2-6-222, per year or 400 pounds of a "hazardous air pollutant," as defined in BAAQMD Rule 2-6-210, per year.

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device is identified by an A and a number (e.g., A24). If a source is also an abatement device, such as when an engine controls VOC emissions, it will have an “S” number. The Fiberglass Filters (A-3) was incorrectly identified A-1 in the prior Title V permit. This typo is corrected in the new permit.

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District’s regulations. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Source and abatement device lists have not been revised since the application was first submitted on January 7, 2002.

### **III. Generally Applicable Requirements**

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound), are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, be specifically described in a Title V permit if they are considered a significant source pursuant to the definition in BAAQMD Rule 2-6-239.

### **IV. Source-Specific Applicable Requirements**

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) are listed following the corresponding District Rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are “federally enforceable” and a “Y” (yes) indication will appear in the “Federally Enforceable” column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the “Federally Enforceable” column will have a “Y” for “yes”. If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion

will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program.

- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this permit evaluation/statement of basis.

#### Complex Applicability Determinations

##### 112(j)

The 1990 Amendments to section 112 of the Clean Air Act included a new section 112(j), which is entitled "Equivalent Emission Limitation by Permit." Section 112(j)(2) provides that the provisions of section 112(j) apply eighteen months after the EPA misses a deadline for promulgation of a standard under section 112(d) established in the source category schedule for standards. The EPA missed the deadline for Reinforced Plastic Composites Production, to which this facility is subject on November 15, 2000.

On May 20, 1994, EPA issued a final rule (40 CFR 63, Subpart B) for implementing section 112(j). That rule requires major source owners or operators to submit a permit application 18 months after a missed date on a regulatory schedule. 40 CFR 63, Subpart B also establishes requirements for the content of the permit applications and contains provisions governing the establishment of the maximum achievable control technology (MACT) equivalent emission limitations by the permitting authority.

40 CFR 63, Subpart B was amended on April 5, 2002. It now requires the applications in two parts. The Part 1 applications were due on May 15, 2002. Western Fiberglass submitted the application on May 14, 2002. The amended regulations allow the facility to request an applicability determination. Any Part 2 application is due two years from the date of the applicability determination. The determination was made on September 19, 2002, therefore the Part 2 application is due September 19, 2004. There is a possibility that the deadline will be shortened to one year. In that case, the District will notify the facility that the application is due by September 19, 2003. Applicable requirements for 40 CFR 63 Subparts A and B were included in the Title V permit.

#### Compliance Assurance Monitoring (CAM)

Although S-2 Closed Mode Vacuum and S-3 Chopper Guns (2) are abated by A-3 Fiberglass Filters (previously identified incorrectly as A-1 in the prior Title V permit), no additional Compliance Assurance Monitoring (CAM) is proposed, because these sources (S-2 and S-3) are not significant particulate sources. According to the Draft Guide to the Estimation and

Permitting of Particulate Emissions from the Manufacture of Reinforced Plastic Composites prepared for the Composite Fabricators Association by Environmental Compliance & Risk Management (dated August 2001), only opening molding via atomized spray application of resin or gelcoat is considered likely to emit significant particulate matter (PM). In addition, the draft guide indicates that if chopper guns are used to disperse glass fibers within the resin stream, any free glass particles that form are likely to be too large to remain suspended long enough to be emitted as particulate. Per the draft guide, because S-2 is a closed mold operation and S-3 is a chopper gun operation, there is no significant emission of PM estimated. The District's Permit Handbook for Polyester Resin Operations also indicates that PM is not a criteria pollutant that is emitted from this type of operation. As a result, no additional CAM was added for A-3. In addition, no additional monitoring for particulate was added for sources S-1 through S-3

All other monitoring is adequately addressed in existing Federal and District regulations and permit conditions. In addition, the sources all have existing throughput limits in their District permit conditions so that increases in throughput would trigger a permit modification. These limits were based on original permit submittals.

Other changes  
Regulation 6

At the time of original permit issuance, if a source had emissions of less than 5 tons per year of a regulated air pollutant for which there was a generally applicable requirement, the applicable requirements for those pollutants were placed in Section III, Generally Applicable Requirements. The District's policy has changed, so the Regulation 6 requirements for Sources S-1, S-2, and S-3 have been placed in Section IV of the permit, Source-Specific Applicable Requirements.

Regulation 8, Rule 50

Regulation 8, Rule 50 was last amended on November 6, 1996. On December 23, 1997, the 12/20/95 version of the rule was adopted into the SIP. Therefore, the current District rule and the SIP rule are not the same, and the permit now contains both versions of the rule. The facility must comply with both the current District rule and the SIP rule.

**V. Schedule of Compliance**

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

“409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

The BAAQMD Compliance and Enforcement Division has conducted a review of compliance over the past year. The only violation is for the late submittal of a semi-annual monitoring report. The facility is not expected to have ongoing problems with reporting. The compliance report is contained in Appendix A of this permit evaluation and statement of basis.

## **VI. Permit Conditions**

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and as appropriate, revised the conditions for clarity and enforceability. Each permit condition is identified with a unique numerical identifier, up to five digits.

Where necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting has been added to the permit.

All changes to existing permit conditions are clearly shown in “strike-out/underline” format in the proposed permit. When the permit is issued, all ‘strike-out’ language will be deleted; all “underline” language will be retained.

The existing permit conditions are generally derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). It is also possible for permit conditions to be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 et seq., an order of abatement pursuant to H&SC § 42450 et seq., or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

The regulatory basis has been referenced following each condition. The regulatory basis may be a rule or regulation. The District is also using the following codes for regulatory basis:

- BACT: This code is used for a condition imposed by the APCO to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- Cumulative Increase: This code is used for a condition imposed by the APCO which limits a source’s operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- Offsets: This code is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- PSD: This code is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit pursuant to Regulation 2, Rule 2.
- TRMP: This code is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District’s Toxic Risk Management Policy.

## **VII. Applicable Limits and Compliance Monitoring Requirements**

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

The tables below contain only the limits for which there is no monitoring or inadequate monitoring in the applicable requirements. The District has examined the monitoring for other limits and has determined that monitoring is adequate to provide a reasonable assurance of compliance. Calculations for potential to emit will be provided in the discussion when no monitoring is proposed due to the size of a source.

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

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

The only limits for which there is no monitoring are the particulate limits below:

PM Sources

<b># &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-1, Filament Winder S-2, Closed Mold Vacuum S-3, Chopper Guns	BAAQMD Regulation 6-301	Ringelmann 1.0	None
S-1, Filament Winder S-2, Closed Mold Vacuum S-3, Chopper Guns	BAAQMD Regulation 6-310	0.15 gr/dscf	None
S-1, Filament Winder S-2, Closed Mold Vacuum S-3, Chopper Guns	BAAQMD Regulation 6-311	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None

According to the Draft Guide to the Estimation and Permitting of Particulate Emissions from the Manufacture of Reinforced Plastic Composites prepared for the Composite Fabricators Association by Environmental Compliance & Risk Management (dated August 2001), only opening molding via atomized spray application of resin or gelcoat is considered likely to emit significant particulate matter (PM). In addition, the draft guide indicates that if chopper guns are used to disperse glass fibers within the resin stream, any free glass particles that form are likely to be too large to remain suspended long enough to be emitted as particulate. Per the draft guide, because S-2 is a closed mold operation and S-3 is a chopper gun operation, there is no significant emission of PM estimated. The District’s Permit Handbook for Polyester Resin Operations also indicates that PM is not a criteria pollutant that is emitted from this type of operation. As a result, no additional CAM was added for A-3. In addition, no additional monitoring for particulate was added for sources S-1 through S-3

All other monitoring is adequately addressed in existing Federal and District regulations and permit conditions. In addition, the sources all have existing throughput limits in their District permit conditions so that increases in throughput would trigger a permit modification. These limits were based on original permit submittals.

**VIII. Test Methods**

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section VI of the permit.

**IX. Permit Shield:**

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit that identifies and justifies specific federally enforceable regulations and standards which the APCO has confirmed are not applicable to a source or group of sources, or (2) A provision in a major facility review permit that identifies and justifies specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting which are subsumed because other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

This facility has no permit shields.

**D. Alternate Operating Scenarios:**

No alternate operating scenario has been requested for this facility.

**E. Compliance Status:**

A office memorandum from the Director of Compliance and Enforcement dated 2/26/02, to the Director of Permit Services, presents a review of the compliance record for Western Fiberglass (Site # A7974). The Compliance and Enforcement Division staff has reviewed the records for the facility for the period between 2/25/01 through 2/24/02. This review was initiated as part of the District evaluation of an application by the facility for renewal of the Title V permit. During the period subject to review, activities known to the District include:

- There was one Notice of Violation issued during this review period for late reporting. This is not expected to be an ongoing problem.
- The District did not receive any complaints.
- The facility is not operating under a Variance or an Order of Abatement from the District Board.
- There were no equipment breakdowns reported or documented by District staff.

The owner certified that all equipment was operating in compliance on 1/7/02.

Permit Evaluation and Statement of Basis: A7974, Western Fiberglass, 1555 Copperhill Parkway,  
Santa Rosa, CA 95403

**F. Differences between the Application and the Proposed Permit:**

Source and abatement device lists have not been revised since the application was first submitted.

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APPENDIX A  
BAAQMD COMPLIANCE REPORT

APPENDIX B  
GLOSSARY

**ACT**

Federal Clean Air Act

**APCO**

Air Pollution Control Officer: Head of Bay Area Air Quality Management District

**ARB**

Air Resources Board

**BAAQMD**

Bay Area Air Quality Management District

**BACT**

Best Available Control Technology

**Basis**

The underlying authority which allows the District to impose requirements.

**CAA**

The federal Clean Air Act

**CAAQS**

California Ambient Air Quality Standards

**CAPCOA**

California Air Pollution Control Officers Association

**CEQA**

California Environmental Quality Act

**CFR**

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

**CO**

Carbon Monoxide

**Cumulative Increase**

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

**District**

The Bay Area Air Quality Management District

**dscf**

Dry Standard Cubic Feet

**EPA**

The federal Environmental Protection Agency.

**Excluded**

Not subject to any District regulations.

**Federally Enforceable, FE**

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

**FP**

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

**HAP**

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.

**Major Facility**

A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.

**MFR**

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.

**MOP**

The District's Manual of Procedures.

**NAAQS**

National Ambient Air Quality Standards

**NESHAPS**

National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

**NMHC**

Non-methane Hydrocarbons (Same as NMOC)

**NMOC**

Non-methane Organic Compounds (Same as NMHC)

**NO<sub>x</sub>**

Oxides of nitrogen.

**NSPS**

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

**NSR**

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

**Offset Requirement**

A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NOx, PM10, and SO2.

**Phase II Acid Rain Facility**

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

**POC**

Precursor Organic Compounds

**PM**

Particulate Matter

**PM10**

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

**PSD**

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

**SIP**

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

**SO2**

Sulfur dioxide

**THC**

Total Hydrocarbons (NMHC + Methane)

**Title V**

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

**TOC**

Total Organic Compounds (NMOC + Methane, Same as THC)

**TPH**

Total Petroleum Hydrocarbons

**TRMP**

Toxic Risk Management Plan

**TSP**

Total Suspended Particulate

**VOC**

Volatile Organic Compounds

**Units of Measure:**

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m <sup>2</sup>	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year