

# **Bay Area Air Quality Management District**

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## **PERMIT EVALUATION and STATEMENT OF BASIS for MAJOR FACILITY REVIEW PERMIT**

for  
**Hexcel Corporation  
Facility #A0054**

**Facility Address:**  
75 North Mines Road  
Livermore, CA 94550

**Mailing Address:**  
75 North Mines Road  
Livermore, CA 94550

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## **Title V Statement of Basis**

### **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, of more than 10 tons per year of 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 40 CFR § 70.2), 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.

### **B. Facility Description**

Hexcel Corporation is a manufacturer of resins and resin-impregnated composite materials, which are used in aerospace and other industries. Hexcel operates resin reactors, resin mixing and blending tanks, and four resin coating towers where composite materials are produced. These sources are abated at four thermal oxidizers. Hexcel applies most of the resins it produces at the coating towers to various substrates, although some resins are sold without application to a substrate. The substrate is generally a synthetic fabric.

### **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., S-24).

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 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.

Following are explanations of the differences in the equipment list between the time that the facility originally applied for a Title V permit and the permit proposal date:

1. The following sources in the application are no longer in service: S-16, S-49, S-51, S-53, S-54, S-55, S-60, S-61. These sources are not addressed in the proposed permit.
2. Abatement devices A-5 and A-6 in the application were replaced by abatement device A-8 after the application was submitted.

3. Sources S-80 and S-81 and abatement device A-22 were permitted after the application was submitted.
4. Abatement device A-2 in the application has been designated A-9 by the District.

### **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 Section 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) listed following the corresponding District Rules. SIP rules are District rules that have been approved by EPA into 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 portions of the SIP rule are cited separately after the District rule. The SIP portions will be federally enforceable; the non-SIP versions will not be federally enforceable, unless EPA has approved them 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.

**New Source Performance Standard (NSPS) Subpart VVV (40 CFR 60 § 740 et seq.)  
Applicability**

Certain groups of sources are subject to this NSPS based on the applicability date of April 30, 1987. Sources which were in service before this date, and which have not been modified, are not subject to this standard. Section IV of the permit, Source-Specific Applicable Requirements, shows which particular sources are subject to the requirements of NSPS Subpart VVV.

**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 only contains elements 2-6-409.10.1 and 2-6-409.10.2.

The BAAQMD Compliance and Enforcement Division conducted a review of compliance over the past year. The facility has had a problem with equipment breakdowns over the past year. The facility has undergone an extensive program of equipment maintenance to resolve the recurrent abatement device breakdowns. This program appears to have resulted in an almost complete elimination of the equipment breakdowns, with no violations documented in the last 4 months of the review period. 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.

For sources without existing throughput limits (i.e., limits on usage of materials or fuels), limits have been imposed in accordance with BAAQMD Regulation 2-1-234.

Conditions that are obsolete or that have no regulatory basis have been deleted from this permit.

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 Air Pollution Control Officer (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 issued 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.

Following are the details of changes made to this facility’s permit conditions:

For sources abated by thermal oxidizers, several standard conditions were added which deal with temperature excursions, if they were not already part of the condition. These are conditions which are now standard for thermal oxidizers, but which may not have been when the sources were first permitted. Although each thermal oxidizer has a specified minimum operating temperature, these standard conditions allow temperature excursions of limited magnitude, duration and frequency, in order to prevent permit condition violations where the effectiveness of the oxidizer was probably not

compromised. These standard conditions include a requirement for the accuracy of the temperature monitoring device and recordkeeping requirements for excursions.

Historically, some permit conditions have included a summary of the applicable requirements in Part 1, including District regulations and federal standards. This provides a quick and convenient method to determine applicable requirements for sources where the requirements may not be obvious. Although full duplication of District regulation or federal requirements is avoided in permit conditions, this summary has been added to many sources for consistency and to continue to provide this useful information.

Resin blend tanks have been assigned a condition which requires that at least 90% by weight of the resin prepared at the tanks are used at facility coaters (which have application limits) such that the coater application limits provide indirect throughput limits on the blend tanks, while providing the applicant with a limited (10%) allowance to produce some resin for use outside the facility.

Monthly recordkeeping has been added for all resin mixers, blend tanks, and reactors.

Condition 7165 was reformatted to be consistent with Condition 6978.

Condition 7166 for S-33 and S-34 will be deleted; S-33 and S-34 will be included under Condition 6978 since these conditions have identical requirements.

Condition 7168 for S-66 will be deleted and S-66 will be included under Condition 7165 since these conditions have identical requirements.

Condition 7519 for S-68, S-69, S-70, S-71, S-72, S-73, and S-80 will be deleted and these sources will be included under Condition 7165 since these conditions have identical requirements.

Condition 8093 will be deleted and S-75 will be included under Condition 7165 since these conditions have identical requirements, except that Condition 8093 includes a throughput limit for S-75. However, a review of Application 9244 shows that S-75 was in service since 1968 and therefore should not have been assigned a throughput limit when it was permitted.

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

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

Under Title V, the District has the authority to impose additional monitoring where: (1) the existing applicable requirement does not require monitoring AND (2) monitoring is necessary to assure compliance with such applicable requirement.

The tables below show the limits that, prior to incorporation in the Title V permit, lack periodic monitoring requirements. Additional monitoring, if any, imposed pursuant to Title V is shown in the last column. The basis for each decision to require additional monitoring is presented in the discussion following each table. Applicable limits not show in the following tables have adequate monitoring, and so no additional monitoring is being proposed in the Title V permit.

**SO<sub>2</sub> Sources**

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-38, S-41, S-58, Coaters S-39, S-40, S-42, S-43, S-59, Ovens, S-81, Coater and Dryer	BAAQMD 9-1-301	Ground level concentrations of SO <sub>2</sub> shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours	None
	BAAQMD 9-1-302	300 ppm (dry)	None

**SO<sub>2</sub> Discussion:**

**BAAQMD Regulation 9-1-301**

Area monitoring to demonstrate compliance with the ground level SO<sub>2</sub> concentration requirements of Regulation 9-1-301 is at the discretion of the APCO (per BAAQMD Regulation 9-1-501). This facility does not have equipment that emits large amounts of SO<sub>2</sub> and therefore is not required to have ground level monitoring by the APCO.

All facility combustion sources are subject to the SO<sub>2</sub> emission limitations in District Regulation 9, Rule 1 (ground-level concentration and emission point concentration). In EPA's June 24, 1999 agreement with CAPCOA and ARB, "Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", EPA has agreed that natural-gas-fired combustion sources do not need additional monitoring to verify compliance with Regulation 9, Rule 1, since violations of the regulation are unlikely. Therefore, no monitoring is necessary for this requirement.

Particulate Sources

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-38, S-41, S-58, Coaters S-39, S-40, S-42, S-43, S-59, Ovens, S-81, Coater and Dryer	BAAQMD Regulation 6-301	Ringelmann 1.0	None
	BAAQMD Regulation 6-310.3	0.15 gr/dscf @ 6% O <sub>2</sub>	None
S-37, Resin Powder Handling Booth	BAAQMD Regulation 6-301	Ringelmann 1.0	Visual inspection
	BAAQMD Regulation 6-310	0.15 gr/dscf	Visual inspection of abatement device
	BAAQMD Regulation 6-311	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	Visual inspection of abatement device

**Particulate Discussion:**

BAAQMD Regulation 6 “Particulate Matter and Visible Emissions”

Visible Emissions

BAAQMD Regulation 6-301 limits visible emissions to no darker than 1.0 on the Ringelmann Chart (except for periods or aggregate periods less than 3 minutes in any hour). Visible emissions are normally not associated with combustion of gaseous fuels, such as natural gas. Sources S-39, S-40, S-42, S-43, S-59, Ovens, and S-81, Coater and Dryer burn natural gas exclusively, therefore, per the EPA's June 24, 1999 agreement with CAPCOA and ARB titled "Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", no monitoring is required to assure compliance with this limit for these sources.

Particulate Weight Limitation

BAAQMD Regulation 6-310 limits filterable particulate (FP) emissions from any source to 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume. Section 310.3 limits filterable particulate emissions from “heat transfer operations” to 0.15 gr/dscf @ 6% O<sub>2</sub>. These are the “grain loading” standards.

Exceedances of the grain loading standards are normally not associated with combustion of gaseous fuels, such as natural gas. Sources S-39, S-40, S-42, S-43, S-59, Ovens, and S-81, Coater and Dryer burn natural gas exclusively, therefore, per the EPA's July 2001 agreement with CAPCOA and ARB entitled "CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources: Summary of Periodic Monitoring Recommendations for Generally

Applicable Requirements in SIP", no monitoring is required to assure compliance with this limit for these sources.

Visual inspection requirements (when S-37 is operated) are added to the S-37 resin handling booth and the associated A-4 baghouse (Condition 17566) to verify compliance with District Regulation 6.

**VOC Sources**

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-21, S-28, S-29, S-35, S-48, S-65, – Batch Mixers S-33 – Experimental Reactor S-34 – Resin Reactor	Condition 6978, Part 2	Minimum 90% application of resin at facility coaters	Usage records
S-27, S-30, S-66, S-75, S-79 – Batch Mixers, S-68-S-73, S-80, Resin Blend Tanks	Condition 7165, Part 2	Minimum 90% application of resin at facility coaters	Usage records
S-38, S-41, S-58, Coaters S-39, S-40, S-42, S-43, S-59, Ovens	BAAQMD 8-12-301.2	Emissions less than 120 gram VOC/liter of coating applied (1.0 lb/gal), excluding water	Operating temperature verifies destruction efficiency; overall compliance verified by annual source test
	Condition 15598, Part 2	Coating and cleanup solvent usage limits (S-38: 71980 gal/yr coating, 451 gal/yr solvent; S-41: 102,268 gal/yr coating, 641 gal/yr solvent)	Usage records
	Condition 15598, Part 3	citation of BAAQMD 8-12-301.2 - emissions less than 120 gram VOC/liter of coating applied (1.0 lb/gal), excluding water	Operating temperature verifies destruction efficiency; overall compliance verified by annual source test
	Condition 15598, Part 4	Minimum abatement device operating temperature (1,400 degrees F)	Operating temperature
S-44, S-45, S-46, S-47, Solvent Storage Tanks	Condition 17897, Part 2	Solvent throughput limit (180,000 gal/yr acetone, 151,000 gal/yr for MEK total for 4 tanks)	Usage records

### VOC Sources

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-58, Coater, S-59, Dryer	Condition 4197, Part 7	120 lb/day VOC emissions	Mass balance
S-64, Hotmelt Pump/Extruder Wipe Cleaning	Condition 4479, Part 7	Solvent usage limit (300 lb/yr net usage)	Usage records
S-67, Solvent Jet Vessel Cleaning System	Condition 7169, Part 2	Solvent usage limit (308 gal/yr)	Usage records

**VOC Discussion:**

Recording usage is standard monitoring for usage limits and restrictions.

Temperature monitoring is standard parametric monitoring for oxidizers that is indicative of destruction efficiency.

**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 the first type of permit shield.

This permit has no streamlining.

Following is the detail of the permit shields that were requested by the applicant.

**1. The following requested permit shields are disallowed:**

- a. The requested permit shield for "hot-melt coaters" and "hot-melt-mixers" from the requirements of 40 CFR § 60.740 (Subpart VVV) on the basis of Section 60.740(d)(2) – (VOC content less than 9% by weight) - is disallowed because this exemption requires that coatings be waterborne. Hot-melt resins are not water-soluble.
- b. Permit shields requested for S-16 and S-60 are disallowed because these sources are out of service.
- c. The requested permit shield for S-37, Resin Powder Handling Booth, from the requirements of District regulations 2-1-301 and 2-1-302 (permitting requirements) on the basis of permit exemption in regulation 2-1-103 (2-1-118.8 is cited in error) is disallowed because 2-1-103 specifically excludes "material handling" sources of particulate emissions.

**2. The following permit shields are allowed:**

- a. The requested permit shield for the Tower I and Tower II coaters from the requirements of 40 CFR § 60.740 (Subpart VVV) on the basis of Section 60.740(c) – (April 30, 1987 commencement of construction, modification or reconstruction) is allowed on the basis of the applicant's representation that this exemption is applicable.
- b. The requested permit shield for all sources from the requirements of District Regulation 8, Rule 29 ("Aerospace Assembly and Component Coating Operations") is allowed. Although the coated composite materials produced by the applicant may be used to fabricate aerospace components, as defined in Regulation 8-29, this regulation addresses the coating of fabricated aerospace components and assemblies, while the applicant is engaged in the fabrication of aerospace assemblies. Therefore, the more general requirements of Regulation 8, Rule 12 ("Paper, Fabric and Film Coating"), are more applicable to the coating operations conducted at the facility.
- c. The requested permit shield for all sources from the requirements of District Regulation 8, Rule 50 ("Polyester Resin Operations") is allowed. Although polyester resins are used at this facility, the more general requirements of Regulation 8, Rule 36 ("Resin Manufacturing"), in combination with Regulation 8, Rule 12, address the operations at this facility more completely than Regulation 8, Rule 50, and require a higher level of abatement as well.
- d. The requested permit shields for all sources from the requirements of 40 CFR § 63.480 (Subpart U), 40 CFR § 63.520 (Subpart W) and 40 CFR § 63.1310 (Subpart JJ) are allowed on the basis

of the applicant's representation that the facility does not manufacture the materials which are the subjects of these regulations.

**D. Alternate Operating Scenarios:**

No alternate operating scenario has been requested for this facility.

**E. Compliance Status:**

The District Compliance and Enforcement Division issued a report on the compliance status of this facility on March 27, 2002 for the period from March 1, 2001 to February 28, 2002. The report concluded that "reasonable intermittent compliance can be assured at this facility for the review period". This conclusion, rather than a simple finding of compliance, was issued because Hexcel was issued 51 violation notices during the review period. All but one of these violation notices were related to breakdowns (ranging from temperature excursions to complete shutdowns) of abatement devices which violated permit conditions. The remaining violation notice was related to the failure to use a mixer lid as required, and was resolved immediately. Regarding the other violation notices, Hexcel has undergone an extensive program of equipment maintenance to resolve the recurrent abatement device breakdowns. This program appears to have resulted in an almost complete elimination of the equipment breakdowns, with no violations documented in the last 4 months of the review period.

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

The Title V permit application was originally submitted on January 3, 1997. This application is the basis for compiling the proposed Title V permit. Changes to the information included in the application include the following:

1. Throughput limits (identified with a legal basis of Regulation 2-1-234.3) have been added to all sources with no existing throughput or emission limits.
2. The following sources in the application are no longer in service: S-16, S-49, S-51, S-53, S-54, S-55, S-60, S-61. These sources are not addressed in the proposed permit.
3. Abatement devices A-5 and A-6 in the application were replaced by abatement device A-8 after the application was submitted.
4. Sources S-80 and S-81 and abatement device A-22 were permitted after the application was submitted.
5. Abatement device A-2 in the application has been designated A-9 by the District.

6. Conditions 7168 for S-66 and Condition 8093 for S-75, which are mentioned in the application, have been merged into Condition 7165.
7. Condition 5478 for S-56 and S-57, which is mentioned in the application, has been merged into Condition 16029.
8. Condition 15598, which applies to sources S-38, S-39, S-40, was not referenced in the application.
9. Throughput limits (identified with a legal basis of Regulation 2-1-234.3) have been added to all sources with no previous throughput or emission limits. Resin blend tanks have been placed under a condition which requires that at least 90% by weight of the resin prepared at the tanks are used at facility coaters (which have application throughput limits) such that the coater application limits provide indirect throughput limits on the blend tanks, while providing the applicant with a limited (10%) allowance to produce some resin for use outside the facility.

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APPENDIX A  
BAAQMD COMPLIANCE REPORT

APPENDIX B  
GLOSSARY

**ACT**

Federal Clean Air Act

**APCO**

Air Pollution Control Officer

**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, NO<sub>x</sub>, PM<sub>10</sub>, and SO<sub>2</sub>.

**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.

**SO<sub>2</sub>**

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