

**AIR QUALITY**  
MANAGEMENT DISTRICT**STATEMENT OF BASIS FOR  
RENEWAL OF TITLE V FEDERAL OPERATING PERMIT**

<b>Title V Permit No.:</b>	<u>TV2008-18-01</u>
<b>Date:</b>	<u>May 26, 2009</u>
<b>Reviewing Engineer:</b>	<u>Bruce Nixon</u>

**FACILITY INFORMATION:**

<b><u>FACILITY NAME:</u></b>	D&T Fiberglass Company, Inc.
<b><u>LOCATION:</u></b>	8900 Osage Avenue Sacramento, CA
<b><u>MAILING ADDRESS:</u></b>	8900 Osage Avenue Sacramento, CA 95828
<b><u>RESPONSIBLE OFFICIAL:</u></b>	Don Stommel, Jr. President (916) 383-9012
<b><u>CONTACT PERSON:</u></b>	Jose Ayala Operations Manager (916) 383-9012

**PURPOSE OF THIS STATEMENT OF BASIS**

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

**PERMIT ACTIONS**

This Statement of Basis is for the first renewal of D&T Fiberglass Company's existing Title V Federal Operating Permit No. TV2004-18-01. The existing permit expires on July 20, 2009.

No permit actions have occurred since the initial Title V Federal Operating Permit No. TV2004-18-01 was issued:

<u>Permit Action</u>	<u>Date Issued</u>	<u>Permit No.</u>
Initial Title V Federal Operating Permit	07-20-2004	TV2004-18-01

This permit action will also include a significant modification within the permit renewal and will be assigned the permit number TV2008-18-01.

## **FACILITY DESCRIPTION**

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

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

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

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

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

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

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

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

## **FACILITY DESCRIPTION**

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

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

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

## **SIGNIFICANT EMISSIONS UNIT DESCRIPTION**

### **A. Gel Coat Spray Room**

SMAQMD Rule 201 Permit to Operate No. 21466

(permit number is for reference purposes only - not federally enforceable)

Size: 16' W x 12' H x 30' D

Spray method: air-assisted airless or non-atomized mechanical spray equipment

### **B. Gel Coat Spray Booth**

SMAQMD Rule 201 Permit to Operate No. 21466

(permit number is for reference purposes only - not federally enforceable)

Size: 15' W x 10' H x 25' D

Spray method: air-assisted airless or non-atomized mechanical spray equipment

### **C. Lamination Layup Spray Room**

SMAQMD Rule 201 Permit to Operate No. 21466

(permit number is for reference purposes only - not federally enforceable)

Size: 35' W x 12' H x 35' D

Spray method: air-assisted airless or non-atomized mechanical spray equipment

### **D. Filament Winding Machine**

SMAQMD Rule 201 Permit to Operate No. 21466

(permit number is for reference purposes only - not federally enforceable)

Manufacturer: Dura-Wound Dura Winder

Model No.: 20

### **E. Miscellaneous Processes**

SMAQMD Rule 201 Permit to Operate No. 21466

(permit number is for reference purposes only - not federally enforceable)

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

**INSIGNIFICANT EMISSIONS UNIT DESCRIPTION**

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

**ALTERNATE OPERATING SCENARIOS**

None requested by permittee.

**FACILITY EMISSIONS**

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

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

<b>APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS</b> <b>Facility-wide Requirements</b>
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**SMAQMD Rule 101 - General Provisions and Definitions**

SIP approved: 03-19-1999 (64 FR 13514)  
[09-03-1998 adopted version]

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

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

**SMAQMD Rule 102 - Circumvention**

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

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

Compliance Status: The permittee complies with the rule requirements.

**SMAQMD Rule 105 - Emission Statement**

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

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

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

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

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

**SMAQMD Rule 201 - General Permit Requirements**

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

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

<b>APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS</b> <b>Facility-wide Requirements</b>
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through the issuance of permits.

Compliance Status: The permittee complies with the rule requirements.

**SMAQMD Rule 202 - New Source Review**

SIP approved: 06-19-1985 (50 FR 25417)  
[11-20-1984 amended version]

**NOTE - the current 02-24-2005 version of this rule is not SIP approved.**

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

Compliance Status: The permittee complies with the rule requirements.

**SMAQMD Rule 207 - Title V Federal Operating Permits**

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

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

Compliance Status: The permittee has submitted a timely and complete permit application for Title V permit renewal.

The permittee complies with the rule requirements.

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

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

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

Compliance Status: The permittee complies with the rule requirements.

<b>APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS</b> <b>Facility-wide Requirements</b>
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**SMAQMD Rule 307 - Clean Air Act Fees**

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

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

Rule Description: This rule requires major sources of ROC and NO<sub>x</sub> to pay specified fees beginning after the U.S. EPA determines that the SMAQMD has failed to demonstrate attainment of the one hour ozone ambient air quality standard by the attainment year.

Compliance Status: Under the current federal ozone non-attainment designation for the Sacramento area, a facility is not classified as a major source if ROC or NO<sub>x</sub> emissions are less than 25 tons/year. The facility is not subject to this rule because the maximum permitted ROC and NO<sub>x</sub> emissions are less than 25 tons/year.

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

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

**SMAQMD Rule 401 - Ringelmann Chart**

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

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

Compliance Status: The permittee complies with the rule requirements.

**SMAQMD Rule 403 - Fugitive Dust**

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

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

<b>APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS</b> <b>Facility-wide Requirements</b>
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Compliance Status: The permittee complies with the rule requirements.

**SMAQMD Rule 404 - Particulate Matter**

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

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

Compliance Status: The permittee complies with the rule requirements.

**SMAQMD Rule 442 - Architectural Coatings**

SIP approved: 11-09-1998 (63 FR 60214)  
[09-05-1996 amended version]

**NOTE - the current 09-25-2008 version of this rule is not SIP approved.**

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

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

The permittee complies with the rule requirements.

**SMAQMD Rule 701 - Emergency Episode Plan**

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

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

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

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

<b>APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS</b> <b>Facility-wide Requirements</b>
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The permittee is not required to comply with this rule.

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

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

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

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

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

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

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

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

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

This subpart applies to any person servicing, maintaining or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances,

<p>APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS <b>Facility-wide Requirements</b></p>
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manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale and persons purchasing class I or class II refrigerants.

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

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

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS  
**Equipment Specific Requirements**  
**Fiberglass Product Manufacturing Process**

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

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

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

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

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

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

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

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

**40 CFR 64 Compliance Assurance Monitoring:**

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

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

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

Rule Compliance: The federal regulation exempts sources that are subject to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act [40 CFR 64.2(b)(1)(i)].

40 CFR 63 Subpart WWWW was developed pursuant to Section 112 of the Act and was promulgated March 05, 2004. Since the fiberglass product manufacturing process is subject to 40 CFR 63 Subpart WWWW

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS  
**Equipment Specific Requirements**  
**Fiberglass Product Manufacturing Process**

it is exempt from Part 64 Compliance Assurance Monitoring.

**Streamlining Multiple Applicable Requirements:**

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

**A. Recordkeeping**

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

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

<b><u>NON</u>-FEDERALLY ENFORCEABLE REQUIREMENTS Facility-wide and Equipment Specific Requirements</b>
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**SMAQMD Rule 301 - Permit Fees - Stationary Source**

SIP approved: Not SIP approved.

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

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

Compliance Status: The permittee complies with the rule requirements.

**SMAQMD Rule 306 - Air Toxic Fees**

SIP approved: Not SIP approved.

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

Compliance Status: The permittee complies with the rule requirements.

**SMAQMD Rule 442 - Architectural Coating**

SIP approved: Not SIP approved.  
[09-25-2008 amended version]  
**NOTE - the 09-05-1996 version of this rule is SIP approved.**

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

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

The permittee complies with the rule requirements.

**SMAQMD Rule 465 - Polyester Resin Operations**

SIP approved: Not SIP approved

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

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

Compliance Status: The permittee complies with the rule requirements.

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

**SMAQMD Rule 466 - Solvent Cleaning**

SIP approved: Not SIP approved.

Rule Description: This rule requires the facility to reduce the emission of ROC from solvent cleaning operations.

Compliance Status: The permittee is not subject to the rule requirements for their polyester resin operations because solvent cleaning is regulated by SMAQMD Rule 465 Polyester Resin Operations and is therefore exempt from this rule (SMAQMD Rule 466 Section 110.1.k).

**NOTE** - The permittee is subject to the rule requirements for cleanup of architectural coating equipment that they may use.

**SMAQMD Rule 602 - Breakdown Conditions: Emergency Variance**

SIP approved: Not SIP approved.

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

Compliance Status: The permittee complies with the rule requirements.

**TITLE V PERMIT RECOMMENDATION:**

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

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

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

# **ATTACHMENT A**

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

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

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	101	General Provisions and Definitions 09-03-1998 version	<b>Yes</b> - no related conditions are included in the permit because of general nature of the rule.
●	●	102	Circumvention 11-29-1983 version	<b>Yes</b> - no related conditions are included in the permit because of general nature of the rule.
	●	103	Exceptions 11-29-1983 version	<b>No</b> - source does not operate the type of equipment described in this rule.
	●	104	General Conformity 11-03-1994 version	<b>No</b> - the rule's purpose is to have the SMAQMD review federal conformity findings.
	●	105	Emission Statement 04-20-1993 version	<b>No</b> - the facility emissions are less than the applicability level of this rule.
		107	Alternative Compliance	<b>No</b> - it is not a SIP approved rule.
●		108	Minor Violations	<b>No</b> - it is not a SIP approved rule.
●	●	201	General Permit Requirements 11-20-1984 version	<b>Yes</b> - no related conditions are included in the permit because of the general nature of the rule.
●	●	202	New Source Review 11-20-1984 version	<b>Yes</b> - related conditions are included in the permit.

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

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		203	Prevention of Significant Deterioration	<b>No</b> - it is not a SIP approved rule.
		204	Emission Reduction Credits	<b>No</b> - it is not a SIP approved rule.
		205	Community Bank and Priority Reserve Bank	<b>No</b> - it is not a SIP approved rule.
		206	Mobile and Transportation Source Emission Reduction Credits	<b>No</b> - it is not a SIP approved rule.
●	*	207	Title V Federal Operating Permit Program	<b>Yes</b> - related conditions are included in the permit. (*Although this is not a SIP approved rule it is applicable because it is part of the SIP approved SMAQMD Title V Permit Program.)
●		208	Acid Rain	<b>No</b> - it is not a SIP approved rule. <i>Note: there is an equivalent federal regulation.</i>
		209	Limiting Potential to Emit	<b>No</b> - it is not a SIP approved rule.
		210	Synthetic Minor Source Status	<b>No</b> - it is not a SIP approved rule.
		211	MACT at Major Sources of Hazardous Air Pollutants	<b>No</b> - it is not a SIP approved rule.

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

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		213	Federal Major Modifications	<b>No</b> - it is not a SIP approved rule.
		215	Agricultural Permit Requirements and New Agricultural Permit Review	<b>No</b> - it is not a SIP approved rule.
●	*	301	Stationary Source Permit Fees	<b>Yes</b> - related conditions are included in the permit. (*Although this is not a SIP approved rule, Title V related fees in the rule are applicable because it is part of the SIP approved SMAQMD Title V Permit Program.)
●		302	Hearing Board Fees	<b>No</b> - it is not a SIP approved rule.
		303	Agricultural Burning Permit Fees	<b>No</b> - it is not a SIP approved rule.
		304	Plan Fees	<b>No</b> - it is not a SIP approved rule.
		305	Environmental Document Preparation and Processing Fees	<b>No</b> - it is not a SIP approved rule.
●		306	Air Toxics Fees	<b>No</b> - it is not a SIP approved rule.
	●	307	Clean Air Act Fees 09-26-2002 version	<b>No</b> - the facility emissions are less than the applicability level of this rule.

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

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		310	Permit Fees - Agricultural Source	<b>No</b> - it is not a SIP approved rule
●	●	401	Ringelmann Chart 04-05-1983 version	<b>Yes</b> - related conditions are included in the permit.
●		402	Nuisance	<b>No</b> - it is not a SIP approved rule.
●	●	403	Fugitive Dust 11-29-1983 version	<b>Yes</b> - related conditions are included in the permit.
●	●	404	Particulate Matter 11-20-1984 version	<b>Yes</b> - related conditions are included in the permit.
	●	405	Dust and Condensed Fumes 11-29-1983 version	<b>No</b> - the source does not operate such a process.
	●	406	Specific Contaminants 11-29-1983 version	<b>No</b> - the source does not operate such a process.
	●	407	Open Burning 11-29-1983 version	<b>No</b> - the source does not operate such a process.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	●	408	Incinerator Burning 11-29-1983 version	<b>No</b> - the source does not operate an incinerator.
	●	409	Orchard Heaters 11-29-1983 version	<b>No</b> - the source does not operate orchard heaters.
	●	410	Reduction of Animal Matter 11-29-1983 version	<b>No</b> - the source does not operate equipment for the reduction of animal matter.
	●	411	Boiler NOx 02-02-1995 version	<b>No</b> - the source does not operate a boiler subject to this rule.
	●	412	Stationary IC Engines at Major Stationary Sources of NOx 06-01-1995 version	<b>No</b> - the source does not operate an IC engine with a rated capacity that is greater than the applicability level of the rule (>50 hp).
	●	413	Stationary Gas Turbines 03-24-2005 version	<b>No</b> - the source does not operate such a process.
●	●	414	Natural Gas Fired Water Heaters 08-01-1996 version	<b>Yes</b> - no related conditions are included in the permit because of general nature of the rule.
		417	Wood Burning Appliances	<b>No</b> - it is not a SIP approved rule.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	420	Sulfur Content of Fuels 11-29-1983 version	<b>Yes</b> - no related conditions are included in the permit because of limited applicability (water heater).
●	●	441	Organic Solvents 11-29-1983 version	<b>Yes</b> - no related conditions are included in the permit because of limited applicability.
●	●	442	Architectural Coatings 09-05-1996 version	<b>Yes</b> - related conditions are included in the permit.
	●	443	Leaks from Synthetic Organic Chemical and Polymer Manufacturing 09-05-1996 version	<b>No</b> - the source does not operate synthetic organic chemical or polymer manufacturing equipment.
	●	444	Petroleum Solvent Dry Cleaning 08-13-1981 version	<b>No</b> - the source does not operate petroleum solvent dry cleaning equipment.
	●	446	Storage of Petroleum Products 11-16-1993 version	<b>No</b> - the source does not store affected petroleum products.
	●	447	Organic Liquid Loading 04-02-1998 version	<b>No</b> - the source does not operate organic liquid loading equipment.
	●	448	Gasoline Transfer into Stationary Storage Containers 02-02-1995 version	<b>No</b> - the source does not operate gasoline transfer equipment.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●		449	Transfer of Gasoline into Vehicle Fuel Tanks 09-26-2002 version	<b>No</b> - the source does not operate gasoline transfer equipment.
●		450	Graphic Arts Operations 12-05-1996 version	<b>No</b> - the source does not operate a graphic arts process as defined in the rule.
●		451	Surface Coating of Miscellaneous Metal Parts and Products 11-29-1983 version	<b>No</b> - the source does not operate such a process.
●		452	Can Coating 09-05-1996 version	<b>No</b> - the source does not operate a can coating process.
●		453	Cutback and Emulsified Asphalt Paving Materials 11-29-1983 version	<b>No</b> - the source does not manufacture or apply cutback or emulsified asphalt paving materials.
●		454	Degreasing Operations 04-03-1997 version	<b>No</b> - the source does not operate degreasers subject to this rule.
●		455	Pharmaceuticals Manufacturing 11-29-1983 version	<b>No</b> - the source does not manufacture pharmaceuticals.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●		456	Aerospace Coating Operations 09-05-1996 version	<b>No</b> - the source does not coat aerospace parts.
		457	Methanol Compatible Tanks	<b>No</b> - it is not a SIP approved rule.
●		458	Large Commercial Bread Bakeries 09-05-1996 version	<b>No</b> - the source does not produce bread products.
●		459	Automotive, Truck and Heavy Equipment Refinishing Operations 10-02-1997 version	<b>No</b> - the source does not refinish vehicles.
●		460	Adhesives and Sealants	<b>No</b> - it is not a SIP approved rule.
		463	Wood Products Coatings	<b>No</b> - it is not a SIP approved rule.
●		464	Organic Chemical Manufacturing Operations 07-23-1998 version	<b>No</b> - the source does not manufacture organic chemicals.
●		465	Polyester Resin Operations	<b>No</b> - it is not a SIP approved rule.
		466	Solvent Cleaning	<b>No</b> - it is not a SIP approved rule.

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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		485	Municipal Landfill Gas	<b>No</b> - it is not a SIP approved rule.
		496	Large Confined Animal Facilities	<b>No</b> - it is not a SIP approved rule.
	●	501	Agricultural Burning 11-29-1983 version	<b>No</b> - the source does not conduct agricultural burning.
	●	601	Procedure before the Hearing Board	<b>No</b> - it is not a SIP approved rule.
	●	602	Breakdown Conditions: Emergency Variance	<b>No</b> - it is not a SIP approved rule.
	●	701	Emergency Episode Plan 05-27-1999 version	<b>No</b> - the facility emissions are less than the applicability level of this rule.
		801	New Source Performance Standards	<b>No</b> - it is not a SIP approved rule. <i>Note: there are equivalent federal regulations.</i>
		901	General Requirements	<b>No</b> - it is not a SIP approved rule. <i>Note: there are equivalent federal regulations.</i>
		902	Asbestos	<b>No</b> - it is not a SIP approved rule. <i>Note: there is an equivalent federal regulation.</i>

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		903	Mercury	<b>No</b> - it is not a SIP approved rule. <i>Note: there is an equivalent federal regulation.</i>
		904	Airborne Toxic Control Measures	<b>No</b> - it is not a SIP approved rule. <i>Note: there are equivalent federal regulations for some of the listed ATCMs.</i>
		1002	Fleet Inventory	<b>No</b> - it is not a SIP approved rule.
		1003	Reduced-Emission Fleet Vehicles/Alternative Fuels	<b>No</b> - it is not a SIP approved rule.
		1005	Mobile Source Emission Reduction Credits/Banking	<b>No</b> - it is not a SIP approved rule.
		1006	Transportation Conformity	<b>No</b> - it is not a SIP approved rule.

## **ATTACHMENT B**

### **SMAQMD RULE 201 PERMITS TO OPERATE**