



Alabama Department of Environmental Management
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May 6, 2025

**RE: Fiber Glass Systems L.P.
Title V Renewal
Facility No. 503-0084
Response to Comments**

To whom it may concern:

On March 28, 2023, an application was submitted to the Air Division of the Alabama Department of Environmental Management (ADEM) for the renewal of a Title V permit for Fiber Glass Systems L.P. Grand Bay Facility. An updated application was received on October 23, 2024. The Draft Permit (No. 503-0084) was the subject of a public comment period ending on March 24, 2025. Below are the responses to comments received during the comment period. The comments are summarized from the written comments received.

Comment 1

Prior to finalizing the permit, ADEM must require the permit applicant to submit missing monitoring reports needed to assess the facility's current compliance with applicable requirements. Furthermore, the quarterly reports that the Permit Applicant has submitted lack critical information needed to evaluate the Facility's compliance status.

Response to Comment 1

The Department reviewed the record for Fiber Glass Systems and noted that all appropriate reports had been submitted and were on file with the Department. As a result of this comment, the Department reviewed the reports for the previous two years and noted no violations.

While the Department makes every effort to make the relevant files available electronically for the public's convenience, the official record repository is at the physical address of the Department. If the public is unable to find specific files in the Department's e-File system, it is incumbent on the public to ask for assistance during the comment period. This allows the Department to rectify errors or oversights and to take action if required documents are not available during the comment period. It was noted that the commentors made no such effort in this instance.

Regarding the content of the reports, it should be noted that there is a distinction between Recordkeeping and Reporting. Commentors cited permit proviso 5.1 for emission units 002, 003 and 004 and pointed out that Records required by that proviso were not all included in the Reports that the facility is required to submit.



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Records required by permits often included voluminous amounts of data, often stored in computer databases. Because of this, the Department requires only a summary of the Records in quarterly, semi-annual, or annual Reports. The Reporting requirements to demonstrate compliance with the facility's VOC limit were laid out in proviso 5.2 for emission units 002, 003 and 004.

Proviso 5.3 lists the reporting requirements of the Reinforced Plastic Composites Production MACT (Subpart WWWW). As allowed by the MACT, these reports are submitted with the semi-annual Title V deviation reports and contain the relevant information for HAP compliance.

Emission factors listed in the application were based off worst case scenario options of all materials used by the facility. While the facility may use resin with a potential emission factor as high as 156.75 lbs/ton, which on its own would exceed the limit of 113 lbs/ton, the facility cannot use such a resin in quantities that cause its weighted average emissions to exceed the calculated weighted average emissions limit. The manual and mechanical operations of the facility are also smaller operations that support the primary operation, which is the tank mandrel operation, producing small accessory components and some touch-up operations. A review of the 4th quarter emission report for 2024 showed that the monthly weighted average HAP emission rate was 95 lbs/ton compared to an allowable emission rate of 113.9 lbs/ton.

Comment 2

The Title V Permit needs to be revised for clarity. The emission limits at the beginning of each section fail to provide the necessary unit of measurement, rendering them confusing and difficult to enforce.

Response to Comment 2

Proviso 2.3 of emission units 002, 003, and 004 states, "Emissions of Hazardous Air Pollutants (HAPs) from this source shall not exceed" 113 or 123 "lb/ton as specified in 40 CFR Part 63 subpart WWWW Reinforce Plastics Composites Production." The use of lb/ton is taken from Table 3 of subpart WWWW, which gives each emission limit using those same units. The second sentence of Proviso 2.3 gives instruction on how to apply the limits by directing the facility to meet the limit using the methods within 40 CFR 63.5810 of the subpart. Each of these methods makes clear that the limit is applicable to resins and gel coats, not to the tons of organic HAP used. For example, the facility currently uses option (c) in 40 CFR 63.5810, which involves calculating a weighted average emission limit. The process given by the subpart for determining the weighted average emission limit clearly states, "multiply the individual organic HAP emissions limits in Table 3..... by the amount of neat resin plus or neat gel coat plus". This information is also presented within the same paragraph of 40 CFR 63.5810 in formulaic form. The Department is confident there is no room for confusion with the proviso written in its current form.

ADEM appreciates your input into this permitting process. If you have any questions or comments, please contact John Robert Gill at (334) 271-7866 or jrgill@adem.alabama.gov.

Sincerely,



Aubrey H. White III, Chief
Air Division

AHW/jrg