

**SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT
CENTRAL REGION
1990 E. Gettysburg Avenue
Fresno, CA 93726
(559) 230-6000**

STAFF REPORT

April 15, 2026

SHORT VARIANCE

DOCKET No. C-26-06S

FACILITY: CertainTeed LLC
17775 Avenue 23 ½
Chowchilla, CA 93610

LOCATION: Same

RULE VIOLATION: 1080 – *Stack Monitoring*
2010 – *Permits Required*
2070 – *Standards for Granting Applications*
2201 – *New and Modified Stationary Source Review Rule*
2520 – *Federally Mandated Operating Permits*
4101 – *Visible Emissions*
4354 – *Glass Melting Furnaces*
California Health and Safety Code section 41701

PERMIT NUMBER: C-261-0-4 and C-261-2-31

EPA AIRS NUMBER: 06-039-C0261

NOV NUMBER: N/A

TYPE OF BUSINESS: Fiberglass Insulation Manufacturing

NATURE OF THE PROBLEM:

CertainTeed LLC (CERTAINTEED) operates a glass-melting furnace and other equipment associated with the production of fiberglass insulation. In order to control particulate matter (PM) emissions, exhaust from the furnace is vented through a pre-conditioning chamber with caustic soda injection and dry electrostatic precipitator (EP) which creates a high voltage electrical field on discharge plates inside the unit. PM from the exhaust stream receive an electrical charge when passing through the discharge plates and are then deposited on the grounded collector plates.

The EP and caustic soda injection system require yearly cleaning. CERTAINTEED plans to complete this annual assessment and maintenance in May this year. To complete the work, they need to shut down and bypass the entire emissions control system, including the continuous emission monitoring system (CEMS) and the Continuous Opacity Monitoring System (COMS), which are on the main exhaust stack. District Rule 4354–*Glass Melting Furnaces*, allows for excess emissions (NO_x, VOC, CO, SO_x, and PM) during maintenance of an add-on emission control system for up to 144 hours per year. However, the emissions exemption for maintenance does not apply to visible emissions. District Rule 4101–*Visible Emissions* limits visible emissions to no more than 20% opacity for up to 3 minutes in any one hour. In the past, CERTAINTEED has experienced visible emissions as high as 95% opacity during maintenance of the emission

control system. Therefore, CERTAINTEED is seeking relief from emissions monitoring requirements, since the CEMS and COMS will be bypassed, as well as visible emissions limits. They are requesting a consecutive 72-hour period in order to perform maintenance on the EP.

Variance protection is necessary because the glass-melting furnace, once heated up, operates non-stop for many years in what is known as a campaign. It cannot be shut off without causing significant damage to the furnace. A glass-melting furnace takes several days to shut down and several weeks to get back to operational temperature.

PETITIONER'S REQUEST:

CERTAINTEED has requested a short variance from the applicable requirements of District Rules 1080, 2010, 2070, 2201, 2520, 4101, 4354, and CH&SC section 41701, in addition to conditions of the subject permits. The requested short variance would be for a consecutive 72-hour period to occur sometime between May 1, 2026, and May 30, 2026, inclusive. If granted, the variance would allow the exhaust stream from the glass melting furnace to bypass the emissions control system, CEMS, and COMS while maintenance is performed on the EP. In addition, the variance would allow visible emissions as high as 95% opacity.

EXCESS EMISSIONS:

Excess emissions are calculated as any emissions over the permitted limit. The permit limit for visible emissions is 20% opacity. CERTAINTEED expects up to 95% opacity, so excess opacity would be 75%.

As mentioned earlier, Rule 4354 allows for up to 144 hours of maintenance on control devices whereby the NO_x, VOC, CO, SO_x, and PM emissions emitted during that time are not considered excess.

IMMEDIATE COMPLIANCE:

CERTAINTEED is currently in compliance.

COMMENTS ON REQUIRED FINDINGS:

1. ***That the petitioner for a variance is, or will be, in violation of Section 41701 or of any rule, regulation, or order of the District.***

Operating the glass-melting furnace while bypassing the emissions control equipment and CEMS, and with excess visible emissions, will result in a violation of applicable requirements of District Rules 1080, 2010, 2070, 2201, 2520, 4101, 4354, and CH&SC section 41701, in addition to applicable conditions of the subject permits.

2. ***That, due to conditions beyond the reasonable control of the petitioner requiring compliance would result in either (1) an arbitrary or unreasonable taking of property, or (2) the practical closing and elimination of a lawful business.***

CERTAINTEED needs to conduct the repairs and maintenance on the EP and caustic scrubber which are recognized as industry standard. CERTAINTEED must bypass the emissions control system and cool down the EP before workers can begin the repairs. Not

only is the EP extremely hot but it is not safe to work around when operating because of the electrical current that is surging through the device.

For CERTAINTEED to continue to stay in compliance, they would have to shut down the glass-melting furnace while the control equipment is off-line. This is not an acceptable industry practice because it would bring about an unreasonable taking of property through severe damage to the furnace and process equipment. A glass melting furnace is designed to run non-stop for many years. If it is cooled down, the refractory has a tendency to crack and break. A glass melting furnace takes several days to shut down and several weeks to get back to operational temperature.

3. *That the closing or taking would be without a corresponding benefit in reducing air contaminants.*

The closing or taking would be without a corresponding benefit in reducing air contaminants as the furnace would have to be shut down. The repairs will take approximately 72 hours. The shutdown of the furnace would take several days, and the startup would take several weeks. The shutdown could result in damage to the furnace as well. To start the furnace back up, CERTAINTEED would have to submit a startup plan to the District and bring in a specialized crew to handle the intricacies of bringing a glass melting furnace up to temperature without causing any damage. A cold start of the furnace would produce a lot of emissions before the furnace comes up to temperature and the EP is hot enough to restart. During the downtime, CERTAINTEED would not be able to provide their customers with product and could lose valuable market share to their competitors. Therefore, a closing or taking would be without a corresponding benefit in reducing air contaminants.

4. *That the applicant for the variance has given consideration to curtailing operations of the source in lieu of obtaining a variance.*

Curtailing production will not limit visible emissions to below 20% and the variance would still be necessary to continue to operate with excess visible emissions.

5. *During the period the variance is in effect, that the applicant will reduce excess emissions to the maximum extent feasible.*

CERTAINTEED will perform the repairs as expeditiously as practicable.

6. *During the period the variance is in effect, that the applicant will monitor or otherwise quantify emission levels from the source, if requested to do so by the District, and report these emissions levels to the District pursuant to a schedule established by the District.*

During the variance period, CERTAINTEED will monitor visible emissions from the source twice a day by using personnel certified in performing a visible emissions evaluation (VEE). This information will be provided to the District at the end of the variance.

ADDITIONAL COMMENTS:

A nuisance as defined in District Rule 4102 is not expected to occur as a result of this variance, nor would continued operation likely create an immediate threat or hazard to public health or safety.

It should be noted that the US Environmental Protection Agency (EPA), which monitors major sources, might not recognize this variance, should it be granted. CERTAINTEED should be aware that the EPA could take enforcement action on this matter if it deems such action is appropriate.

RECOMMENDATIONS:

Should the Central Region Hearing Board make the required findings and move to grant a short variance to CERTAINTEED, the District would recommend the following conditions:

1. The variance shall be effective for a consecutive 72-hour period to occur between May 1, 2026, and May 30, 2026, inclusive, or until the maintenance/repairs have been made and the emissions control equipment has returned to compliant operation, whichever occurs first.
2. Variance relief shall be granted from the requirements of the applicable section of District Rules 1080, 2010, 2070, 2201, 2520, 4101, 4354, and CH&SC section 41701, in addition to the listed conditions of the following permits to operate:

C-261-0-4	Conditions 8, 25
C-261-2-32	Conditions 25, 26, 32, 33, 36, 37
3. The variance shall allow for continued glass manufacturing with excess visible emissions while the exhaust stream bypasses the emissions control system, including the CEMS/COMS, so CERTAINTEED can perform maintenance to the emissions control system.
4. CERTAINTEED shall notify the District at least 24 hours, but no earlier than 96, prior to going into bypass mode. Notification shall be by email to lupe.jauregui@valleyair.org.
5. Visible emissions shall not exceed 95% opacity or Ringelmann 4 $\frac{3}{4}$ during the variance period.
6. CERTAINTEED shall conduct a VEE twice each day during daylight hours. The evaluations shall be at least 6 hours apart. Determination of visible emissions shall be made in accordance with EPA Method 9 with a minimum of 24 consecutive observations recorded in fifteen-second intervals. The person(s) monitoring visible emissions shall be certified by CARB to read visible emissions. A written report of each VEE shall be maintained and a copy shall be provided to the District along with the summary report.
7. CERTAINTEED shall document the bypass time and shall count it towards their 144 hours of annual maintenance allowed per Rule 4354, section 5.10.

8. A Federal Title V deviation report shall be submitted to the District within 10 days each time a Federal Title V permit condition is violated. It should be noted that multiple deviation reports may need to be submitted during this variance period. The deviation report must be sent to the facility inspector.
9. Should the facility experience operational conditions likely to cause a public nuisance, CERTAINTEED shall cease the operations causing the problems and take all necessary actions to abate the problem immediately.
10. At the conclusion of this variance CERTAINTEED must be in compliance with all their permit conditions and applicable District Rules. If CERTAINTEED will not achieve compliance prior to conclusion of this variance they must contact the District as soon as possible and before the variance period ends.
11. By June 14, 2026 or no later than 15 calendar days after finishing the maintenance and returning to compliant operation, whichever occurs first, CERTAINTEED shall submit to the District a summary report. If the report due date should fall on a day the District is closed, it shall be due by the end of the next business day. The report shall include the following:
 - A. A summary of all activities that took place during the variance period,
 - B. The date(s), time(s) and duration of the bypassing,
 - C. Documentation of the VEEs, including the name of person(s) responsible for conducting the visible emission monitoring and copies of their CARB certification, and
 - D. The required certification of truth, accuracy, and completeness, signed by the designated official of the limited liability company, as required by sections 9.13.1 and 10.0 of District Rule 2520 – *Federally Mandated Operating Permits*.
12. The end of the variance summary report shall be submitted to the attention of:

Shannon Moore
SJVAPCD, Compliance Department
1990 E. Gettysburg Ave
Fresno, CA 93726
Telephone: (559) 230-5874
E-mail: shannon.moore@valleyair.org
13. Failure to comply with any condition of this variance may render the variance null and void with the possibility of enforcement action that may include monetary penalties.