



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
SHELBY COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

**Application No: 05-14161
Fac ID: 0575010231**

DATE: 10/6/2005

BBi Enterprises Inc
John Seeley
1167 S Fourth Ave
Sidney, OH 453658943

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

SWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/6/2005
Effective Date: 10/6/2005**

FINAL PERMIT TO INSTALL 05-14161

Application Number: 05-14161
Facility ID: 0575010231
Permit Fee: **\$800**
Name of Facility: BBi Enterprises Inc
Person to Contact: John Seeley
Address: 1167 S Fourth Ave
Sidney, OH 453658943

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1167 S Fourth Ave
Sidney, Ohio**

Description of proposed emissions unit(s):
Two fiberglass mat hydraulic press lines

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	4.55
PE	6.87

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P015 - Press line 112, compression molding of fiberglass mat with thermoset resin	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 0.48 pound per hour and 2.1 tons per year.
		Particulate emissions (PE) shall not exceed 3.28 tons per year.
		The hourly PE limitation required by this rule is equivalent to the limit established pursuant to OAC rule 3745-17-11(B).
		Visible emissions from the stacks shall not exceed 5% opacity.
	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	PE shall not exceed 0.75 pounds per hour.
	OAC rule 3745-21-07(G)	See A.2.b

2. Additional Terms and Conditions

- 2.a** The hourly and annual emission limitations for VOC and PE are established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b** The organic materials employed by this emissions unit shall not be liquid organic materials as defined in OAC rule 3745-21-01(C)(3).

The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, Ohio EPA, Southwest District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emissions limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the composition of the material, and the maximum amount to be used, in pounds per hour.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

- 1.** The permittee shall perform daily (except weekends and holidays) checks from ground level, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from the roof area, the permittee shall also note the following in the operations log:
- a. The location and color of the emissions;
 - b. The cause of the visible emissions;

- c. The total duration of any visible emission incident; and
- d. Any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

D. Reporting Requirements

The permittee shall submit quarterly written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.2.

E. Testing Requirements

Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:

0.48 lb VOC/hr
2.1 tons VOC/yr

Applicable Compliance Method:

The pound of VOC per hour limitation was established by multiplying the maximum hourly fiberglass material usage rate of 152 pounds by the emission factor of 0.003135 lb VOC/lb fiberglass material. The emission factor is based upon a stack test performed on similar air contaminant sources in Bluffton, Indiana.

If required, compliance with the hourly VOC emission limitation shall be demonstrated through a compliance test performed in accordance with Method 1 thru 4 and 25 or 25A of 40 CFR Part 60, Appendix A.

The ton per year limitation was established by multiplying the maximum annual mat usage rate of 1,331,520 pounds (i.e., 152 lbs x 8,760 hrs) by the emission factor of

Emissions Unit ID: **P015**

0.003135 lb VOC/lb mat and dividing the result by 2,000 lbs/ton.

2. Emission Limitation:

0.75 lb PE/hr
3.28 tons PE/yr

Applicable Compliance Method:

The pound of PE per hour limitation was established from Table I of OAC rule 3745-17-11, where the allowable is determined by multiplying 4.10 by the maximum process weight rate, 0.08 tons, to the 0.67 power.

If required, compliance with the hourly PE limitation shall be demonstrated through a compliance test performed in accordance with Methods 1 thru 5 of 40 CFR, Part 60, Appendix A.

The ton PE per year limitation was established by multiplying the hourly PE limit by 8,760 hours per year and dividing the result by 2,000 lbs/ton.

3. Emission Limitation:

Visible emissions from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P016 - Press line 114, compression of fiberglass mat with thermoset resin	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 0.56 pound per hour and 2.45 tons per year.</p> <p>Particulate emissions (PE) shall not exceed 3.59 tons per year.</p> <p>The hourly PE limitation required by this rule is equivalent to the limit established pursuant to OAC rule 3745-17-11(B).</p> <p>Visible emissions from the stacks shall not exceed 5% opacity.</p>
	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	PE shall not exceed 0.82 pounds per hour.
	OAC rule 3745-21-07(G)	See A.2.b

2. Additional Terms and Conditions

- 2.a** The hourly and annual emission limitations for VOC and PE are established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b** The organic materials employed by this emissions unit shall not be liquid organic materials as defined in OAC rule 3745-21-01(C)(3).

The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, Ohio EPA, Southwest District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emissions limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the composition of the material, and the maximum amount to be used, in pounds per hour.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

- 1.** The permittee shall perform daily (except for weekends and holidays) checks from ground level, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from the roof area, the permittee shall also note the following in the operations log:
- a. The location and color of the emissions;
 - b. The cause of the visible emissions;

- c. The total duration of any visible emission incident; and
- d. Any corrective actions taken to eliminate the visible emissions.

If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from daily to weekly.

D. Reporting Requirements

The permittee shall submit quarterly written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.2.

E. Testing Requirements

Compliance with the emission limitations in Section A..1. of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:

0.56 lb VOC/hr
2.45 tons VOC/yr

Applicable Compliance Method:

The pound of VOC per hour limitation was established by multiplying the maximum hourly fiberglass material usage rate of 178 pounds by the emission factor of 0.003135 lb VOC/lb fiberglass material. The emission factor is based upon a stack test performed on similar air contaminant sources in Bluffton, Indiana.

If required, compliance with the hourly VOC emission limitation shall be demonstrated through a compliance test performed in accordance with Method 1 thru 4 and 25 or 25A of 40 CFR Part 60, Appendix A.

The ton per year limitation was established by multiplying the maximum annual mat usage rate of 1,559,280 pounds (i.e., 178 lbs x 8,760 hrs) by the emission factor of 0.003135 lb VOC/lb mat and dividing the result by 2,000 lbs/ton.

2. Emission Limitation:

0.82 lb PE/hr
3.59 tons PE/yr

Applicable Compliance Method:

The pound of PE per hour limitation was established from Table I of OAC rule 3745-17-11, where the allowable is determined by multiplying 4.10 by the maximum process weight rate, 0.09 tons, to the 0.67 power.

If required, compliance with the hourly PE limitation shall be demonstrated through a compliance test performed in accordance with Methods 1 thru 5 of 40 CFR, Part 60, Appendix A.

The ton PE per year limitation was established by multiplying the hourly PE limit by 8,760 hours per year and dividing the result by 2,000 lbs/ton.

3. Emission Limitation:

Visible emissions from the stack shall not exceed 5% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

None

Emissions Unit ID: **P016**

SIC CODE 3710 SCC CODE 3-05-01-214 EMISSIONS UNIT ID P015

EMISSIONS UNIT DESCRIPTION P015 - Press line 112, compression molding of fiberglass mat with thermoset resin

DATE INSTALLED Jan. 2005

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	compliance	0.75 lb/hr	3.28	0.75 lb/hr	3.28
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	compliance	0.48 lb/hr	2.1	0.48 lb/hr	2.1
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? no NESHAP? no PSD? no OFFSET POLICY? no

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT is 5% VOC and no liquid organic materials to be employed.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

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Emissions Unit ID: **P016**

SIC CODE 3710 SCC CODE 3-05-01-214 EMISSIONS UNIT ID P016
 EMISSIONS UNIT DESCRIPTION P016 - Press line 114, compression of fiberglass mat with thermoset resin
 DATE INSTALLED jan. 2005

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	compliance	0.82 lb/hr	3.59	0.82 lb/hr	3.59
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	compliance	0.56 lb/hr	2.45	0.56 lb/hr	2.45
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? no NESHAP? no PSD? no OFFSET POLICY? no

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT is 5% VOC and no liquid organic materials to be employed.

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TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____