

Synthetic Minor Determination and/or Netting Determination

Permit To Install: **05-14406**

A. Source Description:

BBi, Enterprises, L.P. (BBi) is a small sized manufacturer of thermal and acoustical insulators for the automobile industry. Based upon potential emissions, BBi is not a major facility for air pollution emissions. Nevertheless, BBi has requested federally enforceable emission limitations for VOC and HAP to ensure minor source status.

B. Facility Emissions and Attainment Status:

BBi is located at 1167 S. Fourth Avenue, Sidney, Ohio, Shelby County. At this time, Shelby County is classified as attainment for ozone.

BBi's facility-wide potential emissions are 37.61 tons for VOC. This synthetic minor permit to install will limit VOC emissions to 4.8 tons and individual HAP emissions to 9.0 ton and combined HAP'S (P001 through P017) to 24 tons per rolling, 12-month summations.

The emissions limitations are accomplished by limiting facility-wide material usage to 12,401,650 pounds per rolling, 12-month summation. The material usage limitation accompanied with proper record keeping and reporting will ensure that BBi maintains compliance with the federally enforceable emission limitations.

C. Source Emissions:

Each air contaminant source is a compression molding system that employs thermoset resin in fiberglass. Each air contaminant source is identical except the size. The largest source has a maximum hourly throughput of 370 pounds, and the smallest source has a maximum hourly throughput of 27 pounds.

Air contaminant emissions from each air source include VOC, particulate, and HAP. The maximum emission rate of 1.1 lbs VOC/hr and 1.4 lbs PE/hr. At maximum annual potential this emissions unit will emit 4.8 tons of VOC and 6.12 tons PE. This facility will be limited to and overall HAP emission limits of 9.0 tons of any individual HAP and 24.0 tons of all combined HAP's.

D. Conclusion:

This synthetic minor permit to install will effectively limit the individual HAP and combined HAP's emissions from emissions unit P001 thru P017. The individual HAP and combined HAP's emissions from emissions units P001 thru P017 will be limited to 9.0 tons and 24.00 tons, respectively. The emissions limitations identified in this permit represent all the air contaminant emissions at this facility.

A combination of a rolling, 12-month material usage limitation, monthly record keeping requirements and quarterly deviation reporting requirements shall ensure that compliance with the permit is maintained.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
SHELBY COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 05-14406

Fac ID: 0575010231

DATE: 2/27/2007

BBi Enterprises Inc
John Seeley
1167 S Fourth Ave
Sidney, OH 45365-8943

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

SWDO

IN

SHELBY COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **05-14406** FOR AN AIR CONTAMINANT SOURCE FOR
BBi Enterprises Inc

On 2/27/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **BBI Enterprises Inc**, located at **1167 S Fourth Ave, Sidney, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-14406:

The installation of a 370 lb/hr Compression molding machine.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Jeff Hines, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911
[(937)285-6357]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 05-14406

Application Number: 05-14406
Facility ID: 0575010231
Permit Fee: **To be entered upon final issuance**
Name of Facility: BBi Enterprises Inc
Person to Contact: John Seeley
Address: 1167 S Fourth Ave
Sidney, OH 45365-8943

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

Description of proposed emissions unit(s):
The installation of a 370 lb/hr Compression molding machine.

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

Chris Korleski
Director

BBI Enterprises Inc
PTI Application: 05-14406
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0575010231

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 recordkeeping 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 recordkeeping 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 (i.e., postmarked) quarterly 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 the premises of this source at any reasonable time for purposes of making inspections,

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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)

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

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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.

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

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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>
PE	6.12
VOC	4.78
HAP individual	9.0*
HAP's combined	24.0*
* facility-wide limits	

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.

Operations, Property, and/or Equipment - (P017) - 370 lb/hr compression molding machine, Press Line 115

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 4.8 tons per 12-month rolling period. Particulate emissions (PE) emissions from this emissions unit shall not exceed 6.12 tons per 12-month rolling period. The total Individual HAP and combined HAP's annual emissions from emissions units P001 thru P017 shall not exceed 9.0 ton and 24.0 tons respectively , as based on a rolling 12-month summation of all HAP(s) employed within these emissions units. See Section A.2.b Limit(s)
OAC rule 3745-17-07(A)	Visible emission from the stack shall not exceed 20% opacity
OAC rule 3745-17-11(B)(1)	The PE emissions shall not exceed 45 lbs per hour.
OAC rule 3745-21-07(G)	At maximum potential the organic compound emissions are below the 8 lbs/hr and 40 lbs/day limitation of PRM of this rule.

2. Additional Terms and Conditions

- 2.a The annual emission limitations listed under OAC rule 3745-31-05(C) 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 actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 thru P017 shall not exceed 9.0 TPY* of any individual HAP, nor 24.0 tons TPY* of all

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combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* The calculated HAP(s) emission rate is based on the results of a stack test of a similar emissions unit in Bluffton, Indiana. It was found that HAP(s) are emitted at a rate of 9.0×10^{-5} lbs/lb of product.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001 thru P017, combined:
 - a. the uncured resinated fiberglass material usage, in pounds;
 - b. the rolling, 12-month summation of the uncured resinated fiberglass material usage, in pounds;
 - c. the individual HAP emissions, ie, (a)(9.0×10^{-5} lbs/lb mat*)(1 ton/2000lbs)
 - d. the rolling, 12-month of monthly individual HAP emissions.
 - e. the combined HAP emissions, i.e., (a)(9.0×10^{-5} lb HAP/lb mat*)(1 ton/2000 lbs); and
 - f. the rolling, 12-month summation of monthly combined HAP emissions.

* The calculated emission rate is based on the results of a stack test of a similar emissions unit in Bluffton, Indiana.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12-month individual HAP emissions of 9.0 tons and combined HAP emissions limitation of 24.0 tons for emissions units P001 thru P017, combined.

Emissions Unit ID: **P017**

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

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

- a. Emission Limitation: 6.13 tons PE/yr

Applicable Compliance Method: The combined hourly and rolling 12-month emission limitation was established by the following methodology:

$$\text{AER} = [(\text{Hp} \times \text{Ef}) \times (24 \text{ hr/ day}) \times (365 \text{ days/yr})] / 2000$$

where:

AER= Annual Emission Rate, tons/yr;

Hp= Hourly Maximum Production rate, lbs/hr; and

Ef= particulate emission factor, lbs of particulate emitted per pound of fiberglass material. (0.004015 lbs/lb of fiberglass, from stack test on similar emissions unit in Bluffton, Indiana).

- b. Emission Limitation: 4.78 tons OC/yr

Applicable Compliance Method: The combined hourly and rolling 12-month emission limitation was established by the following methodology:

$$\text{AER} = [(\text{Hp} \times \text{Ef}) \times (24 \text{ hr/ day}) \times (365 \text{ days/yr})] / 2000$$

where:

AER= Annual Emission Rate, tons/yr;

Hp= Hourly Maximum Production rate, lbs/hr; and

Ef= particulate emission factor, lbs of particulate emitted per pound of fiberglass material. (0.003135 lbs/lb of fiberglass, from stack test on similar emissions unit in Bluffton, Indiana).

- c. Emission Limitation: 9.0 tons of individual HAP/yr & 24.0 tons of combined HAPs/yr

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Applicable Compliance Method: The combined hourly and rolling 12-month emission limitation was established by the following methodology:

$$\text{AER} = [(\text{Hp} \times \text{Ef}) \times (24 \text{ hr/ day}) \times (365 \text{ days/yr})] / 2000$$

where:

AER= Annual Emission Rate, tons/yr;

Hp= Hourly Maximum Production rate, lbs/hr; and

Ef= particulate emission factor, lbs of particulate emitted per pound of fiberglass material. (9.0 x 10⁻⁵ lbs/lb of product, from stack test on similar emissions unit in Bluffton, Indiana).

- d. The permittee shall conduct, or have conducted, emission testing for this emissions unit to demonstrate applicability of the emission factors used in determining the potential volatile organic compound (VOC).
 - a. The emission testing shall be conducted within 3 months after start-up.
 - b. The emission testing shall be conducted to demonstrate applicability of the emission factors used in determining the potential volatile organic compound (VOC) emissions.
 - c. The following test methods shall be employed to determine the actual emission rates from this emissions unit:

VOC: Methods 25 (25A) of 40 CFR Part 60, Appendix A;

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emission units being is being operated at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for

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review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

F. Miscellaneous Requirements

None