Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Permit Evaluation
and
Statement of Basis
for
Minor Revision to the

MAJOR FACILITY REVIEW PERMIT

for

Hubbell Lenoir City, Inc.
Facility #A2918

Facility Address:
615 North King Road
San Jose, CA 95133

Mailing Address:
615 North King Road
San Jose, CA 95133

January, 2008

Application Engineer: Weyman Lee
Site Engineer: Dharam Singh

Application: #17059

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Title V Statement of Basis

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the "potential to emit," as defined by BAAQMD Regulation 2-6-218, of more than 10 tons per year of a hazardous air pollutant (HAP).

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A2918.

Hubbell Lenoir City, Inc. has requested to replace existing styrene resin stripper, SVC-12, with a lower VOC-containing stripper at Source S-5 Auto-con Polymer Concrete Mixing Machine. This source is subject to current Permit Condition #17170 limits the resin stripping material to one specific product. The applicant is proposing to use a new stripper, ACL-23, with less volatility (203F flashpoint) and lower VOC content (65 g/l) than the current SVC-12 (160F and 990 g/l). Hubbell has also requested that the Permit Condition be revised so that the company will have the flexibility to use any resin stripper that will not emit more than the SVC-12 stripper.

B. NSR Permit Evaluation

See Appendix B for the Permit Evaluation.

C. Supplemental Information

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities.

The proposed Minor Permit Revision does not change this section of the permit.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

The proposed Minor Permit Revision does not change this section of the permit.

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit

The proposed Minor Permit Revision does not change this section of the permit.

IV. Source-Specific Applicable Requirements

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit.

Complex Applicability Determinations

This permit did not require any complex applicability determinations.

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

"409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted."

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

VI. Permit Conditions

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

- BACT: This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- Cumulative Increase: This term is used for a condition imposed by the APCO which limits a source's operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- Offsets: This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- PSD: This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.
- TRMP: This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy.

All changes to existing permit conditions are clearly shown in "strike-out/underline" format in the proposed permit. When the permit is issued, all 'strike-out" language will be deleted and all "underline" language will be retained, subject to consideration of comments received.

Additional monitoring has been added, where appropriate, to assure compliance with the applicable requirements.

Condition #17170
For S5, Mixing and Casting Operations

1. The owner/operator shall ensure the resin solution throughput shall not exceed 750,000 gallons per consecutive 12-month period. (basis: cumulative increase)

2. The owner/operator shall maintain Styrene monomer content of the resin solution to be 43% (average) by weight and shall not exceed 46% by weight. (basis: cumulative increase)

3 The owner/operator shall use at S5 a resin solution containing vapor suppressant. (basis: Regulation 8-50-301.2)

4. The owner/operator shall maintain clean-up solvent (~~SVC-12~~ACL-23) usage that shall not exceed 550 gallons per consecutive 12-month period. The owner/operator may use an alternate cleanup solvent or use in excess of 550 gallons per year provided that the owner/operator can demonstrate that total POC emissions from S-5 do not exceed 4544 pounds in any consecutive twelve month period and the use of these materials does not increase toxic emissions above any chronic risk screening trigger level of Table 2-5-1 in Regulation 2-5. (basis: cumulative increase; Regulation 8-50-305.4)

5. The owner/operator of S5 shall keep the following records in a District approved logbook:

   a. Maintain a list of resin, catalyst, vapor suppressant, and clean-up solvent used. (basis: Regulation 8-50-501.1)
   b. Maintain a list of weight percent of volatile organic compound (VOC) in the resin solution, and grams of VOC per liter for the clean-up materials. (basis: Regulation 8-50-501.2)
   c. Maintain a list of weight loss (grams per square meter) during resin polymerization, and monomer percentage. (basis: Regulation 8-50-501.3)
   d. Maintain records on a daily basis of the resin solution, catalyst, vapor suppressant, and clean-up materials used. (basis: Regulation 8-50-501.4)
   e. If a material other than that specified is used or if the throughput is exceeded in Part 4, POC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Part 4, on a monthly basis

   Such records shall be retained on site for a period of at least five years from the date of data entry and be made available to the District staff for inspection. (basis: Regulation 2-6-501; cumulative increase)

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

The District has reviewed all monitoring and has determined the existing monitoring is adequate.

Table VII-A has been amended to include the maximum annual POC limit.

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

IX. Permit Shield:

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit explaining that specific federally enforceable regulations and standards do not apply to a source or group of sources, or (2) A provision in a major facility review permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting are subsumed because

other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

This facility has no permit shields.

X. Revision History

This section contains the details of issuance and revisions for each permit.

Title V Permit Issuance: **June 1, 2000**

Minor Revision: (application 2072) **January 28, 2002**

Increase in styrene resin solution throughput at mixing and casting operations, S5.
Increase in aggregate throughput at the aggregate storage silos, S13, S14, and S15.
Permit to operate a new baghouse, A4.

Renewal (Application # 11267) **October 23, 2006**

Minor Revision (Application #17059)
Modify Permit Condition #17170 to allow use of new resin stripper and flexibility to use alternate resin strippers.

XI. Glossary

See Appendix A

D. Alternate Operating Scenarios:

No alternate operating scenario has been requested for this facility.

F. Differences between the Application and the Proposed Permit:

There are no differences.

APPENDIX A

GLOSSARY

ACT
Federal Clean Air Act

APCO
Air Pollution Control Officer

ARB
Air Resources Board

BAAQMD
Bay Area Air Quality Management District

BACT
Best Available Control Technology

Basis
The underlying authority which allows the District to impose requirements.

CAA
The federal Clean Air Act

CAAQS
California Ambient Air Quality Standards

CAPCOA
California Air Pollution Control Officers Association

CEM
Continuous Emission Monitor

CEQA
California Environmental Quality Act

CFR
The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO
Carbon Monoxide

Cumulative Increase
The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Cumulative increase is used to determine whether threshold-based requirements are triggered.

District
The Bay Area Air Quality Management District

dscf

Dry Standard Cubic Feet

EPA
The federal Environmental Protection Agency.

Excluded
Not subject to any District regulations.

FDOC
Final Determination of Compliance (FDOC), prepared pursuant to District Regulation 2, Rule 3, Power Plants.

Federally Enforceable, FE
All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

FP
Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

HAP
Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.

HRSG
Heat Recovery Steam Generator

Major Facility
A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.

MFR
Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.

MOP
The District's Manual of Procedures.

NAAQS
National Ambient Air Quality Standards

NESHAPS
National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

NMHC
Non-methane Hydrocarbons (Same as NMOC)

NMOC
Non-methane Organic Compounds (Same as NMHC)

NOx
Oxides of nitrogen.

NSPS
Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

NSR
New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement
A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NOx, PM10, and SO2.

Phase II Acid Rain Facility
A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

POC
Precursor Organic Compounds

PM
Particulate Matter

PM10
Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD
Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

PUC
Public Utilities Commission (California)

SIP
State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2
Sulfur dioxide

THC
Total Hydrocarbons (NMHC + Methane)

Title V
Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TOC
Total Organic Compounds (NMOC + Methane, Same as THC)

TPH
Total Petroleum Hydrocarbons

TRMP
Toxic Risk Management Plan

TSP
Total Suspended Particulate

VOC
Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m^2	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

APPENDIX B

Permit Evaluation for Application 17043

ENGINEERING EVALUATION REPORT
Hubbell Lenoir City, Inc.
PLANT NUMBER 17888
APPLICATION NUMBER 17043

I. BACKGROUND

Hubbell Lenoir City (Hubbell) is a manufacturer of underground utility boxes of various shapes and sizes for use as service boxes, electrical equipment pads, telephone cabinet pads, CATV enclosures, water meter boxes, box pads, and traffic signal bases.

The reinforced plastic composite boxes are produced by mixing resin, catalyst, and aggregates in a bucket, after which the mixture is poured into a mold. After curing, the casting is de-molded and prepared for shipment.

Hubbell has submitted a permit application to replace the existing styrene resin stripper, SVC-12, with a lower VOC-containing stripper at:

S-5 Auto-con Polymer Concrete Mixing Machine

Current Permit Condition #17170 limits the resin stripping material to one specific product. The applicant is proposing to use a new stripper, ACL-23, with less volatility (203F flashpoint) and lower VOC content (65 g/l) than the current SVC-12 (160F and 990 g/l). Hubbell has also requested that the Permit Condition be revised so that the company will have the flexibility to use any resin stripper that will not emit more than the SVC-12 stripper.

Emissions from the facility are primarily hazardous air pollutants such as styrene from storage tanks and mixing/casting operation, and PM10 from aggregate silos. This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act and BAAQMD Regulation 2, Rule 6, Major Facility Review pursuant to Regulation 2-6-212. It has the potential to emit more than 10 tons per year of styrene, a hazardous air pollutant. Since this proposed modification to permit conditions does not result in an increase in emissions, pursuant to Regulation 2-6-215, the amendment to the Title V Operating Permit will be considered a minor permit revision.

II. EMISSIONS DATA

The current POC emissions, based on SVC-12 stripper, and using mass balance methodology:

(550 gal/yr)(990 g/l)(1lb/453.59g)(3.785 liter/gal) = **4544 lb POC/yr (2.27 ton/yr)**

Hubbell is proposing to use ACL-23 stripper that will emit the following:

(550 gal/yr)(65 g/l)(1lb/453.59g)(3.785 liter/gal) = **298 lb POC/yr (0.15 ton/yr)**

Therefore no net POC emissions increase will result in replacing the current stripper with the new ACL-23 stripper.

III. CUMULATIVE EMISSIONS

A risk analysis is not required for this application since the emissions are not expected to increase.

IV. APPLICABLE REQUIREMENTS

A. Regulation 2-5: New Source Review of Toxic Air Contaminants

No toxic air contaminants listed in Regulation 2-5 are in the ACL-23 stripper as per the MSDS.

B. Regulation 2-1-233: Alter

S-5 is an altered source pursuant to Regulation 2-1-233

C. Regulation 2, Rule 2: New Source Review

This project is not subject to New Source Review since S-5 is not considered a new or modified source with the replacement of the SVC-12 stripper by the ACL-23 stripper.

D. CEQA

This project is categorically exempt from CEQA under Regulation 2-1-312.6, which exempts "permit applications relating exclusively to the repair, maintenance or minor alteration of existing facilities, equipment or sources involving negligible or no expansion of use beyond that previously existing".

E. Regulation 8-50: Polyester Resin Operations

Source S-5 will remain in compliance with Regulation 8-50-305 since the new resin stripper contains much less than 200 g/l VOC content.

F. Regulation 10: Standards of Performance for New Stationary Sources

Regulation 10 incorporates by reference the provisions of Title 40 CFR Part 63 Subpart WWWW, "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composite Production." The applicant demonstrates compliance with the applicable requirements in the Title Permit. The facility is expected to be in compliance with the alteration to S-5.

G. NESHAP Part 63 Subpart A

This facility is subject to the MACT requirement pursuant to Regulation 2-2-114 since styrene emissions are greater than 10 tons per year. The alteration to S-5, which does not emit any HAP, will not effect compliance with MACT standards.

V. PERMIT CONDITIONS

Permit Condition #17170 will be amended as indicated below:

Condition #17170
For S5, Mixing and Casting Operations

1. The owner/operator shall ensure the resin solution throughput shall not exceed 750,000 gallons per consecutive 12-month period. (basis: cumulative increase)

2. The owner/operator shall maintain Styrene monomer content of the resin solution to be 43% (average) by weight and shall not exceed 46% by weight. (basis: cumulative

increase)

3 The owner/operator shall use at S5 a resin solution containing vapor suppressant. (basis: Regulation 8-50-301.2)

4. The owner/operator shall maintain clean-up solvent (ACL-23) usage that shall not exceed 550 gallons per consecutive 12-month period. The owner/operator may use an alternate cleanup solvent or use in excess of 550 gallons per year provided that the owner/operator can demonstrate that total POC emissions from S-5 do not exceed 4544 pounds in any consecutive twelve month period and the use of these materials does not increase toxic emissions above any chronic risk screening trigger level of Table 2-5-1 in Regulation 2-5. (basis: cumulative increase; Regulation 8-50-305.4)

5. The owner/operator of S5 shall keep the following records in a District approved logbook:

a. Maintain a list of resin, catalyst, vapor suppressant, and clean-up solvent used. (basis: Regulation 8-50-501.1)
b. Maintain a list of weight percent of volatile organic compound (VOC) in the resin solution, and grams of VOC per liter for the clean-up materials. (basis: Regulation 8-50-501.2)
c. Maintain a list of weight loss (grams per square meter) during resin polymerization, and monomer percentage. (basis: Regulation 8-50-501.3)
d. Maintain records on a daily basis of the resin solution, catalyst, vapor suppressant, and clean-up materials used. (basis: Regulation 8-50-501.4)
e. If a material other than that specified is used or if the throughput is exceeded in Part 4, POC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Part 4, on a monthly basis. (basis: cumulative increase; Regulation 8-50-305.4)

Such records shall be retained on site for a period of at least five years from the date of data entry and be made available to the District staff for inspection. (basis: Regulation 2-6-501; cumulative increase)

VI. RECOMMENDATIONS

It is recommended that an Alteration be issued to Hubbell for the following:

S-5 Auto-con Polymer Concrete Mixing Machine

VII. EXEMPTIONS

None

By: Weyman Lee_____ Date: 1/23/08_____