

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install 08-04466

**A. Source Description**

Voss Auto Collision Center, SIC 7532 an auto body repair shop is submitting this air permit to install (PTI) application as a synthetic minor to limit volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions to less than 100 tons per year (TPY) VOC, 10 TPY of an individual HAP and 25 TPY for a combination of all HAPs emitted from the facility. Therefore, the facility will not trigger the Title V operating permitting requirements or the Maximum Achievable Control Technology (MACT) regulation for Miscellaneous Metal Parts Coating under 40 Code of Federal Regulations (CFR) Part 63, Subpart M.

**B. Facility Emissions and Attainment Status**

This facility will consist of 6 auto body repair booths, all with the same operations, coating usages, and stack parameters. When evaluating the potential emissions for this facility, the worst case scenario was used incorporating the worst case coatings, the maximum hourly coating usage rate, and an annual operating schedule of 8760 hours. The potential to emit (PTE) for VOC is 176 TPY using the coating 222 S with the highest VOC content of 6.7 lbs of VOC/gallon of coating. The individual HAP PTE of 64.91 TPY was developed using coating 222S with the highest individual HAP content of 2.47 lbs of toluene/gallon of coating and the combination of facility wide HAPs PTE of 104.59 TPY was developed using coating 2330S with a HAP content of 3.98 lbs of HAPs/gallon of coating.

This facility is located in Montgomery County which is designated as attainment for ozone.

**C. Source Emissions**

Although the potential emissions are very large for this source, these emissions are not practical for an auto body repair shop and are very conservative because they are based on using the worst case coatings at all times. When evaluating the actual emissions for Voss, based upon past usage records and predicted increases in production, HAP emissions should not exceed 3.32 TPY and VOC emissions should not exceed 11.6 TPY.

**D. Conclusion**

By limiting the maximum coating usage for each paint booth to 576 gallons of coating per year, the facility-wide VOC emissions will be limited to 11.6 TPY. Additionally, limiting HAP emissions to 9.9 TPY of an individual HAP and 24.9 TPY of any combination of HAPs through federally enforceable terms and conditions and record keeping requirements, Voss will not trigger the Title V permitting requirements or MACT requirements.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

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

**CERTIFIED MAIL**

**Application No: 08-04466**

**DATE: 3/25/2003**

Voss Auto Collision Ctr  
Jack Leet  
766 Miamisburg-Centerville Rd  
Centerville, OH 454596523

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, 43266-0149.

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 **\$1200** 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.

Very truly yours,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA      RAPCA      Miami Valley Regional Planning Commission      KY      IN

**MONTGOMERY COUNTY**

**PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04466 FOR AN AIR CONTAMINANT SOURCE FOR  
VOSS AUTO COLLISION CTR**

On 3/25/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Voss Auto Collision Ctr**, located at **90 Loop Rd, Centerville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04466:

**6 misc metal parts spray booths.**

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.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280  
[(937)225-4435]



**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 08-04466**

Application Number: 08-04466  
APS Premise Number: 0857023235  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Voss Auto Collision Ctr  
Person to Contact: Jack Leet  
Address: 766 Miamisburg-Centerville Rd  
Centerville, OH 454596523

Location of proposed air contaminant source(s) [emissions unit(s)]:

**90 Loop Rd  
Centerville, Ohio**

Description of proposed emissions unit(s):

**6 misc metal parts spray booths.**

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

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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 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 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 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

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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 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

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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**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

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3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(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	11.6

**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>
K001 - Misc. Metal Parts Booth No. 1 - Auto and Truck Repair	OAC rule 3745-31-05(A)(3)	Volatile Organic Compounds (VOC) shall not exceed the following: 6.7 pounds per hourlbs /hr, excluding cleanup materials  1.93 tons per year (TPY) VOC, including cleanup materials  The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09(U)(2)(c).See
	OAC rule 3745-21-07(G)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(A)(2)(a).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V permitting requirements	VOC emissions shall not exceed 1.93 TPY, based upon based upon a rolling, 12-month summation of the monthly VOC emissions.  See Section A.2.b. and B.1.

**Voss A**

**PTI A**

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Emissions Unit ID: **K001**

**2. Additional Terms and Conditions**

- 2.a** The 6.7 lbs VOC/hr limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

**B. Operational Restrictions**

- 1. The maximum annual coating usage rate for this emissions unit shall not exceed 3860 pounds VOC/576 gallons based on a rolling, 12-month summation.
- 2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall not exceed the following coating usages for this emissions unit:

<u>Month</u>	<u>Maximum, Cumulative Total Pounds</u>
<u>Month</u>	<u>VOC/Gallon Coating Usage</u>
1-6	1930288
1-7	2251.7336
1-8	2573.4384
1-9	2895432
1-10	3216.7480
1-11	3538.4528
1-12	3860576

After the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall comply with the annual usage rate limitation based upon a rolling 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for this emissions unit to determine annual VOC emissions:
  - a. The name and identification number of each coating employed.

- b. The volume, in gallons, of each coating employed.
  - c. The VOC content of each coating, as applied, in pounds per gallon.
  - d. The name and identification of each cleanup material employed.
  - e. The number of gallons of each cleanup material employed.
  - f. The number of gallons of each cleanup material drummed for shipment off-site.
  - g. The VOC content of each cleanup material, in pounds per gallon.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - hi. During the first twelve calendar months of operation following the issuance of this permitstartup, the cumulative coating VOC usage rate for each calendar month, in pounds. Following the first twelve calendar months of operation following the issuance of the permitstartup, the rolling, 12-month summation of the coating VOC usage rate from this emissions unit, in poundsgallons/rolling, 12-month period.
  - i. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - j. The rolling, 12-month summation of the monthly VOC emissions.
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, and K006:
- a. The name and identification number of each coating material employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating material, in pounds of individual HAP per gallon , as applied.
  - c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.2.b.).

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- d. The number of gallons of each coating material employed.
- e. The name and identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.2.f.).
- h. The number of gallons of each cleanup material employed.
- i. The number of gallons of each cleanup material drummed for shipment off-site.
- j. The total individual HAP emission rate, in tons per month, for each HAP (i.e., for each HAP, the sum of the products of C.2.b. X C.2.d. for each coating material plus the sum of the products of [C.2.f. X (C.2.h.- C.2.i.)] for each cleanup material).
- k. The total combined HAP emission rate, in tons per month, for all HAPs employed (i.e., the sum of the products of C.2.c. X C.2.d. for each coating material plus the sum of the products of [C.2.g. X (C.2.h. - C.2.i.)] for each cleanup material).
- l. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
- m. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

\*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001 through K006 combined, and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using

Voss A

PTI A

Emissions Unit ID: **K001**

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data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 19.8

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1454.7

MAGLC (ug/m<sup>3</sup>): 1888

Pollutant: N-Butyl Alcohol

TLV (mg/m<sup>3</sup>): 60.63

Maximum Hourly Emission Rate (lbs/hr): 9.12

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 670.04

MAGLC (ug/m3): 1444

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still

**Voss A**

**PTI A**

Emissions Unit ID: **K001**

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satisfies the "Air Toxic Policy"; and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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**D. Reporting Requirements**

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
  - b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
  - c. For the first 12 months of operation following the issuance of this permitstartup of this emissions unit, an identification of each month during which the coating usage exceeded the maximum cumulative coating usage limitation specified in Section B.2., and the actual cumulative coating usage for each such month.
  - d. An identification of each month during which the rolling, 12-month coating usage exceeded the 3860 lbs VOC 576 gallons rolling, 12-month summation limitation, and the actual rolling, 12-month coating usage summation for each such month.
  - e. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 1.93 TPY rolling, 12-month summation limitation, and the actual rolling, 12-month emission summation for each such month.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - 1.a Emission Limitation -

**Voss Auto Collision Ctr**  
**PTI Application: 08-04466**  
**Issued**

**Facility ID: 0857023235**

Emissions Unit ID: **K001**

6.7 lbs VOC/hr, excluding cleanup materials

Applicable Compliance Method -  
Compliance shall be based upon the maximum hourly coating usage rate and the maximum  
VOC content.

Voss A

PTI A

Emissions Unit ID: **K001**

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- 1.b Emission Limitation -  
1.93 TPY VOC, including cleanup materials, as a rolling 12-month summation
- Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirement specified in Sections C.1. and C.3. of this permit.
- 1.c Emission Limitation -  
9.9 TPY of an individual HAP, based on a 12-month rolling summation
- Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
- 1.d Emission Limitation -  
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation
- Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
- 1.e Emission Limitation -  
3860 lbs coating/576 gallons coating/year, as a rolling 12-month summation
- Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Sections C.1. and C.3. of this permit.

#### **F. Miscellaneous Requirements**

1. The terms and conditions from Section A.2.b., Section B.1., Section B.2., Section C.1., Section C.2., and Section D.1. are federally enforceable.

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**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>
K002 - Misc. Metal Parts Booth No. 2 - Auto and Truck Repair (See section A.2.c)	OAC rule 3745-31-05(A)(3)	Volatile Organic Compounds (VOC) shall not exceed the following: 6.7 lbs /hr, excluding cleanup materials
	OAC rule 3745-31-05(A)(3)	1.93 TPY VOC, including cleanup materials
	OAC rule 3745-21-09(U)(1)	The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09(U)(2)(c).
	OAC Rule 3745-21-07(G)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(A)(2)(a).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V permitting requirements	VOC emissions shall not exceed 1.93 TPY, based upon based upon a rolling, 12-month summation of the monthly VOC emissions.
		See Section A.2.b. and B.1.

**Voss A**

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Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a The 6.7 lbs VOC/hr limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. Operational Restrictions

1. The maximum annual coating usage rate for this emissions unit shall not exceed 3860 pounds VOC576 gallons based on a rolling, 12-month summation.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall not exceed the following coating usages for this emissions unit:

<u>Month</u>	<u>Maximum, Cumulative Total Pounds</u>
<u>Month</u>	<u>VOC CoatingGallon Usage</u>
1-6	2881930
1-7	2251.7336
1-8	2573.4384
1-9	2895432
1-10	3216.7480
1-11	3538.4528
1-12	3860576

After the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall comply with the annual usage rate limitation based upon a rolling 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit to determine annual VOC emissions:
  - a. The name and identification number of each coating employed.

- b. The volume, in gallons, of each coating employed.
  - c. The VOC content of each coating, as applied, in pounds per gallon.
  - d. The name and identification of each cleanup material employed.
  - e. The number of gallons of each cleanup material employed.
  - f. The number of gallons of each cleanup material drummed for shipment off-site.
  - g. The VOC content of each cleanup material, in pounds per gallon.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - ih. During the first twelve calendar months of operation following the issuance of the permitstartup, the cumulative VOC coating usage rate for each calendar month, in pounds. Following the first twelve calendar months of operation following the issuance of this permitstartup, the rolling, 12-month summation of the coating VOC usage rate from this emissions unit, in poundsgallons/rolling, 12-month period.
  - i. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - j. The rolling, 12-month summation of the monthly VOC emissions.
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, and K006:
- a. The name and identification number of each coating material employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating material, in pounds of individual HAP per gallon , as applied.
  - c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.2.b.).

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- d. The number of gallons of each coating material employed.
- e. The name and identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.2.f.).
- h. The number of gallons of each cleanup material employed.
- i. The number of gallons of each cleanup material drummed for shipment off-site.
- j. The total individual HAP emission rate, in tons per month, for each HAP (i.e., for each HAP, the sum of the products of C.2.b. X C.2.d. for each coating material plus the sum of the products of [C.2.f. X (C.2.h.- C.2.i.)] for each cleanup material).
- k. The total combined HAP emission rate, in tons per month, for all HAPs employed (i.e., the sum of the products of C.2.c. X C.2.d. for each coating material plus the sum of the products of [C.2.g. X (C.2.h. - C.2.i.)] for each cleanup material).
- l. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
- m. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

\*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001 through K006 combined, and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using

Emissions Unit ID: **K002**

data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 19.8

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1454.7

MAGLC (ug/m<sup>3</sup>): 1888

Pollutant: N-Butyl Alcohol

TLV (mg/m<sup>3</sup>): 60.63

Maximum Hourly Emission Rate (lbs/hr): 9.12

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Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 670.04

MAGLC (ug/m3): 1444

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

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- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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**D. Reporting Requirements**

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
  - b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
  - c. For the first 12 months of operation following the issuance of this permitstartup of this emissions unit, an identification of each month during which the coating usage exceeded the maximum cumulative coating usage limitation specified in Section B.2., and the actual cumulative coating usage for each such month.
  - d. An identification of each month during which the rolling, 12-month coating usage exceeded the 3860 lbs VOC 576 gallons rolling, 12-month summation limitation, and the actual rolling, 12-month coating usage summation for each such month.
  - e. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 1.93 TPY rolling, 12-month summation limitation, and the actual rolling, 12-month emission summation for each such month.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - 1.a Emission Limitation -  
6.7 lbs VOC/hr, excluding cleanup materials

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Applicable Compliance Method -

Compliance shall be based upon the maximum hourly coating usage rate and the maximum VOC content.

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- 1.b Emission Limitation -  
1.93 TPY VOC, including cleanup materials, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirement specified in Sections C.1. and C.3. of this permit.
- 1.c Emission Limitation -  
9.9 TPY of an individual HAP, based on a 12-month rolling summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
- 1.d Emission Limitation -  
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
- 1.e Emission Limitation -  
3860 lbs coating VOC/576 gallons coating/year, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Sections C.1. and C.3. of this permit.

**F. Miscellaneous Requirements**

1. The terms and conditions from Section A.2.b., Section B.1., Section B.2., Section C.1., Section C.2., and Section D.1. are federally enforceable.

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**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>
K003 - Misc. Metal Parts Booth No. 3 - Auto and Truck Repair (See section A.2.c)	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compounds (VOC) shall not exceed the following: 6.7 lbs/hr, excluding cleanup materials</p> <p>1.93 TPY VOC, including cleanup materials</p> <p>The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B).</p>
	OAC rule 3745-21-09(U)(1)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09(U)(2)(c).
	OAC rule 3745-21-07(G)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(A)(2)(a).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V permitting requirements	<p>VOC emissions shall not exceed 1.93 TPY, based upon based upon a rolling, 12-month summation of the monthly VOC emissions.</p> <p>See Section A.2.b. and B.1.</p>

**2. Additional Terms and Conditions**

- 2.a** The 6.7 lbs VOC/hr limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

**B. Operational Restrictions**

- 1. The maximum annual coating usage rate for this emissions unit shall not exceed 3860 pounds VOC576 gallons based on a rolling, 12-month summation.
- 2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall not exceed the following coating usages for this emissions unit:

<u>Month</u>	<u>Maximum, Cumulative Total Pounds</u>
<u>Month</u>	<u>VOC CoatingGallon Usage</u>
1-6	1930288
1-7	2251.7336
1-8	2573.4384
1-9	2895432
1-10	3216.7480
1-11	3538.4528
1-12	3860576

After the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall comply with the annual usage rate limitation based upon a rolling 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for this emissions unit to determine annual VOC emissions:
  - a. The name and identification number of each coating employed.

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- b. The volume, in gallons, of each coating employed.
  - c. The VOC content of each coating, as applied, in pounds per gallon.
  - d. The name and identification of each cleanup material employed.
  - e. The number of gallons of each cleanup material employed.
  - f. The number of gallons of each cleanup material drummed for shipment off-site.
  - g. The VOC content of each cleanup material, in pounds per gallon.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - hi. During the first twelve calendar months of operation following the issuance of this permitstartup, the cumulative coating VOC usage rate for each calendar month, in pounds. Following the first twelve calendar months of operation following the issuance of this permitstartup, the rolling, 12-month summation of the coating VOC usage rate from this emissions unit, in gallons/rolling, 12-month period.
  - i. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - j. The rolling, 12-month summation of the monthly VOC emissions.
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, and K006:
- a. The name and identification number of each coating material employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating material, in pounds of individual HAP per gallon , as applied.
  - c. The total combined HAP content of each coating material, in pounds of combined HAPs

per gallon, as applied (the sum of all the individual HAP contents from C.2.b.).

- d. The number of gallons of each coating material employed.
- e. The name and identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.2.f.).
- h. The number of gallons of each cleanup material employed.
- i. The number of gallons of each cleanup material drummed for shipment off-site.
- j. The total individual HAP emission rate, in tons per month, for each HAP (i.e., for each HAP, the sum of the products of C.2.b. X C.2.d. for each coating material plus the sum of the products of [C.2.f. X (C.2.h. - C.2.i.)] for each cleanup material).
- k. The total combined HAP emission rate, in tons per month, for all HAPs employed (i.e., the sum of the products of C.2.c. X C.2.d. for each coating material plus the sum of the products of [C.2.g. X (C.2.h. - C.2.i.)] for each cleanup material).
- l. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
- m. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

\*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit K003 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001 through K006 combined, and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions"

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policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 19.8

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1454.7

MAGLC (ug/m<sup>3</sup>): 1888

Pollutant: N-Butyl Alcohol

TLV (mg/m<sup>3</sup>): 60.63

Maximum Hourly Emission Rate (lbs/hr): 9.12

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Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 670.04

MAGLC (ug/m3): 1444

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

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- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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**D. Reporting Requirements**

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
  - b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
  - c. For the first 12 months of operation following the issuance of this permitstartup of this emissions unit, an identification of each month during which the coating usage exceeded the maximum cumulative coating usage limitation specified in Section B.2., and the actual cumulative coating usage for each such month.
  - d. An identification of each month during which the rolling, 12-month coating usage exceeded the 3860 lbs VOC576 gallons rolling, 12-month summation limitation, and the actual rolling, 12-month coating usage summation for each such month.
  - e. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 1.93 TPY rolling, 12-month summation limitation, and the actual rolling, 12-month emission summation for each such month.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - 1.a Emission Limitation -  
6.7 lbs VOC/hr, excluding cleanup materials

**Voss A**

**PTI A**

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Emissions Unit ID: **K003**

Applicable Compliance Method -  
Compliance shall be based upon the maximum hourly coating usage rate and the maximum  
VOC content.

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Emissions Unit ID: **K003**

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- 1.b Emission Limitation -  
1.93 TPY VOC, including cleanup materials, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirement specified in Sections C.1. and C.3. of this permit.
- 1.c Emission Limitation -  
9.9 TPY of an individual HAP, based on a 12-month rolling summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
- 1.d Emission Limitation -  
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
- 1.e Emission Limitation -  
3860 lbs coating VOC/576 gallons coating/year, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Sections C.1. and C.3. of this permit.

**F. Miscellaneous Requirements**

- 1. The terms and conditions from Section A.2.b., Section B.1., Section B.2., Section C.1., Section C.2., and Section D.1. are federally enforceable.

**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>
K004 - Misc. Metal Parts Booth No. 4 - Auto and Truck Repair (See section A.2.c)	OAC rule 3745-31-05(A)(3)	Volatile Organic Compounds (VOC) shall not exceed the following: 6.7 lbs/hr, excluding cleanup materials  1.93 TPY VOC, including cleanup materials  The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09(U)(2)(c).
	OAC rule 3745-21-07(G)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(A)(2)(a).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V permitting requirements	VOC emissions shall not exceed 1.93 TPY, based upon based upon a rolling, 12-month summation of the monthly VOC emissions.  See Section A.2.b. and B.1.

**Voss A**

**PTI A**

**Issued: To be entered upon final issuance**

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

**2.a** The 6.7 lbs VOC/hr limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

**B. Operational Restrictions**

1. The maximum annual coating usage rate for this emissions unit shall not exceed 3860 lbs VOC/576 gallons based on a rolling, 12-month summation.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall not exceed the following coating usages for this emissions unit:

<u>Month</u>	<u>Maximum, Cumulative Total Pounds</u>
<u>Month</u>	<u>VOC CoatingGallon Usage</u>
1-6	2881930
1-7	2251.7336
1-8	2573.4384
1-9	2895432
1-10	3216.7480
1-11	3538.4528
1-12	3860576

After the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall comply with the annual usage rate limitation based upon a rolling 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit to determine annual VOC emissions:

a. The name and identification number of each coating employed.

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- b. The volume, in gallons, of each coating employed.
- c. The VOC content of each coating, as applied, in pounds per gallon.
- d. The name and identification of each cleanup material employed.

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- e. The number of gallons of each cleanup material employed.
  - f. The number of gallons of each cleanup material drummed for shipment off-site.
  - g. The VOC content of each cleanup material, in pounds per gallon.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - hi. During the first twelve calendar months of operation following the issuance of this permitstartup, the cumulative coating VOC usage rate for each calendar month, in pounds. Following the first twelve calendar months of operation following the issuance of this permitstartup, the rolling, 12-month summation of the coating VOC usage rate from this emissions unit, in poundsgallons/rolling, 12-month period.
  - i. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - j. The rolling, 12-month summation of the monthly VOC emissions.
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, and K006:
- a. The name and identification number of each coating material employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating material, in pounds of individual HAP per gallon , as applied.
  - c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.2.b.).
  - d. The number of gallons of each coating material employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of

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individual HAP per gallon of cleanup material, as applied.

- g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.2.f.).
- h. The number of gallons of each cleanup material employed.
- i. The number of gallons of each cleanup material drummed for shipment off-site.

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- j. The total individual HAP emission rate, in tons per month, for each HAP (i.e., for each HAP, the sum of the products of C.2.b. X C.2.d. for each coating material plus the sum of the products of [C.2.f. X (C.2.h.- C.2.i.)] for each cleanup material).
- k. The total combined HAP emission rate, in tons per month, for all HAPs employed (i.e., the sum of the products of C.2.c. X C.2.d. for each coating material plus the sum of the products of [C.2.g. X (C.2.h. - C.2.i.)] for each cleanup material).
- l. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
- m. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

\*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit K004 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001 through K006 combined, and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 19.8

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 1454.7

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MAGLC (ug/m3): 1888

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Emissions Unit ID: K004

Pollutant: N-Butyl Alcohol

TLV (mg/m3): 60.63

Maximum Hourly Emission Rate (lbs/hr): 9.12

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 670.04

MAGLC (ug/m3): 1444

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

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- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
  - b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
  - c. For the first 12 months of operation following the issuance of this permitstartup of this emissions unit, an identification of each month during which the coating usage exceeded the maximum cumulative coating usage limitation specified in Section B.2., and the actual cumulative coating usage for each such month.
  - d. An identification of each month during which the rolling, 12-month coating usage exceeded the 3860 lbs VOC576 gallons rolling, 12-month summation limitation, and the actual rolling, 12-month coating usage summation for each such month.
  - e. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 1.93 TPY rolling, 12-month summation limitation, and the actual rolling, 12-month emission summation for each such month.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - 1.a Emission Limitation -  
6.7 lbs VOC/hr, excluding cleanup materials  
  
Applicable Compliance Method -  
Compliance shall be based upon the maximum hourly coating usage rate and the maximum VOC content.
  - 1.b Emission Limitation -  
1.93 TPY VOC, including cleanup materials, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirement specified in Sections C.1. and C.3. of this permit.
  - 1.c Emission Limitation -  
9.9 TPY of an individual HAP, based on a 12-month rolling summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
  - 1.d Emission Limitation -  
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
  - 1.e Emission Limitation -  
3860 lbs coating VOC/576 gallons coating/year, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Sections C.1. and C.3. of this permit.

**F. Miscellaneous Requirements**

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**Issued: To be entered upon final issuance**

1. The terms and conditions from Section A.2.b., Section B.1., Section B.2., Section C.1., Section C.2., and Section D.1. are federally enforceable.

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**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>
K005 - Misc. Metal Parts Booth No. 5 - Auto and Truck Repair (See section A.2.c)	OAC rule 3745-31-05(A)(3)	Volatile Organic Compounds (VOC) shall not exceed the following: 6.7 lbs /hr, excluding cleanup materials  1.93 TPY VOC, including cleanup materials  The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09(U)(2)(c).
	OAC rule 3745-21-07(G)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(A)(2)(a).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V permitting requirements	VOC emissions shall not exceed 1.93 TPY, based upon based upon a rolling, 12-month summation of the monthly VOC emissions.  See Section A.2.b. and B.1.

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Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

**2.a** The 6.7 lbs VOC/hr limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

**B. Operational Restrictions**

1. The maximum annual coating usage rate for this emissions unit shall not exceed 3860 lbs VOC576 gallons based on a rolling, 12-month summation.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall not exceed the following coating usages for this emissions unit:

<u>Month</u>	<u>Maximum, Cumulative Total Pounds</u>
<u>Month</u>	<u>VOC CoatingGallon Usage</u>
1-6	1930288
1-7	2251.7336
1-8	2573.4384
1-9	2895432
1-10	3216.7480
1-11	3538.4528
1-12	3860576

After the first 12 calendar months of operation following the issuance of this permitstartup of this emissions unit, the permittee shall comply with the annual usage rate limitation based upon a rolling 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for this emissions unit to determine annual VOC emissions:
  - a. The name and identification number of each coating employed.

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- b. The volume, in gallons, of each coating employed.
- c. The VOC content of each coating, as applied, in pounds per gallon.
- d. The name and identification of each cleanup material employed.

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- e. The number of gallons of each cleanup material employed.
  - f. The number of gallons of each cleanup material drummed for shipment off-site.
  - g. The VOC content of each cleanup material, in pounds per gallon.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - hi. During the first twelve calendar months of operation following the issuance of this permitstartup, the cumulative coating VOC usage rate for each calendar month, in pounds. Following the first twelve calendar months of operation following the issuance of this permitstartup, the rolling, 12-month summation of the coating VOC usage rate from this emissions unit, in poundsgallons/rolling, 12-month period.
  - i. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - j. The rolling, 12-month summation of the monthly VOC emissions.
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, and K006:
- a. The name and identification number of each coating material employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating material, in pounds of individual HAP per gallon , as applied.
  - c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.2.b.).
  - d. The number of gallons of each coating material employed.
  - e. The name and identification of each cleanup material employed.
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of

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individual HAP per gallon of cleanup material, as applied.

- g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.2.f.).
- h. The number of gallons of each cleanup material employed.
- i. The number of gallons of each cleanup material drummed for shipment off-site.

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- j. The total individual HAP emission rate, in tons per month, for each HAP (i.e., for each HAP, the sum of the products of C.2.b. X C.2.d. for each coating material plus the sum of the products of [C.2.f. X (C.2.h.- C.2.i.)] for each cleanup material).
- k. The total combined HAP emission rate, in tons per month, for all HAPs employed (i.e., the sum of the products of C.2.c. X C.2.d. for each coating material plus the sum of the products of [C.2.g. X (C.2.h. - C.2.i.)] for each cleanup material).
- l. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
- m. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

\*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit K005 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001 through K006 combined, and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 19.8

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 1454.7

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MAGLC (ug/m3): 1888

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Emissions Unit ID: K005

Pollutant: N-Butyl Alcohol

TLV (mg/m<sup>3</sup>): 60.63

Maximum Hourly Emission Rate (lbs/hr): 9.12

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 670.04

MAGLC (ug/m<sup>3</sup>): 1444

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
  - b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
  - c. For the first 12 months of operation following the issuance of this permitstartup of this emissions unit, an identification of each month during which the coating usage exceeded the maximum cumulative coating usage limitation specified in Section B.2., and the actual cumulative coating usage for each such month.
  - d. An identification of each month during which the rolling, 12-month coating usage exceeded the 3860 lbs VOC576 gallons rolling, 12-month summation limitation, and the actual rolling, 12-month coating usage summation for each such month.
  - e. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 1.93 TPY rolling, 12-month summation limitation, and the actual rolling, 12-month emission summation for each such month.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

**Issued: To be entered upon final issuance**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

1.a Emission Limitation -  
6.7 lbs VOC/hr, excluding cleanup materials

Applicable Compliance Method -  
Compliance shall be based upon the maximum hourly coating usage rate and the maximum VOC content.

1.b Emission Limitation -  
1.93 TPY VOC, including cleanup materials, as a rolling 12-month summation

Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirement specified in Sections C.1. and C.3. of this permit.

1.c Emission Limitation -  
9.9 TPY of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.

1.d Emission Limitation -  
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.

1.e Emission Limitation -  
3860 lbs coating VOC/576 gallons coating/year, as a rolling 12-month summation

Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Sections C.1. and C.3. of this permit.

**F. Miscellaneous Requirements**

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**Issued: To be entered upon final issuance**

1. The terms and conditions from Section A.2.b., Section B.1., Section B.2., Section C.1., Section C.2., and Section D.1. are federally enforceable.

Issued: To be entered upon final issuance

**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>
K006 - Misc. Metal Parts Booth No. 6 - Auto and Truck Repair	OAC rule 3745-31-05(A)(3)	Volatile Organic Compounds (VOC) shall not exceed the following: 6.7 pounds per hourlbs /hr, excluding cleanup materials  1.93 tons per year (TPY) VOC, including cleanup materials  The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(U)(1)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09(U)(2)(c).
	OAC rule 3745-21-07(G)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(A)(2)(a).
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V permitting requirements	VOC emissions shall not exceed 1.93 TPY, based upon based upon a rolling, 12-month summation of the monthly VOC emissions.

See Section A.2.b. and B.1.

**2. Additional Terms and Conditions**

- 2.a** The 6.7 lbs VOC/hr limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

**B. Operational Restrictions**

- 1. The maximum annual coating usage rate for this emissions unit shall not exceed 3860 pounds VOC/576 gallons based on a rolling, 12-month summation.
- 2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit startup of this emissions unit, the permittee shall not exceed the following coating usages for this emissions unit:

<u>Month</u>	<u>Maximum, Cumulative Total Pounds</u>
<u>Month</u>	<u>VOC/Gallon Coating Usage</u>
1-6	1930288
1-7	2251.7336
1-8	2573.4384
1-9	2895432
1-10	3216.7480
1-11	3538.4528
1-12	3860576

After the first 12 calendar months of operation following the issuance of this permit startup of this emissions unit, the permittee shall comply with the annual usage rate gallon limitation based upon a rolling 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for this emissions unit to determine annual VOC emissions:
  - a. The name and identification number of each coating employed.

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- b. The volume, in gallons, of each coating employed.
  - c. The VOC content of each coating, as applied, in pounds per gallon.
  - d. The name and identification of each cleanup material employed.
  - e. The number of gallons of each cleanup material employed.
  - f. The number of gallons of each cleanup material drummed for shipment off-site.
  - g. The VOC content of each cleanup material, in pounds per gallon.
  - h. The total VOC emissions from all coatings and cleanup materials employed, in tons/month, (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material).
  - hi. During the first twelve calendar months of operation following the issuance of this permitstartup, the cumulative coating VOC usage rate for each calendar month, in pounds. Following the first twelve calendar months of operation following the issuance of this permitstartup, the rolling, 12-month summation of the coating VOC usage rate from this emissions unit, in gallonspounds/rolling, 12-month period.
  - i. The total VOC emissions from all coatings and cleanup materials employed, in tons/month (i.e., the summation of the products of C.1.b. X C.1.c. for each coating material plus the sum of the products of [(C.1.e.-C.1.f.) X C.1.g.] for each cleanup material). .
  - j. The rolling, 12-month summation of the monthly VOC emissions.
2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, and K006:
- a. The name and identification number of each coating material employed.
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating material, in pounds of individual HAP per gallon , as applied.
  - c. The total combined HAP content of each coating material, in pounds of combined HAPs

per gallon, as applied (the sum of all the individual HAP contents from C.2.b.).

- d. The number of gallons of each coating material employed.
- e. The name and identification of each cleanup material employed.
- f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.2.f.).
- h. The number of gallons of each cleanup material employed.
- i. The number of gallons of each cleanup material drummed for shipment off-site.
- j. The total individual HAP emission rate, in tons per month, for each HAP (i.e., for each HAP, the sum of the products of C.2.b. X C.2.d. for each coating material plus the sum of the products of [C.2.f. X (C.2.h. - C.2.i.)] for each cleanup material).
- k. The total combined HAP emission rate, in tons per month, for all HAPs employed (i.e., the sum of the products of C.2.c. X C.2.d. for each coating material plus the sum of the products of [C.2.g. X (C.2.h. - C.2.i.)] for each cleanup material).

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- l. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
- m. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

\*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit K006 was evaluated based on the actual materials (typically coatings and cleanup materials) for emissions units K001 through K006 combined, and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 19.8

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 1454.7

MAGLC (ug/m3): 1888

Pollutant: N-Butyl Alcohol

TLV (mg/m3): 60.63

Maximum Hourly Emission Rate (lbs/hr): 9.12

**Voss A**

**PTI A**

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Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 670.04

MAGLC (ug/m3): 1444

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Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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**D. Reporting Requirements**

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:

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- a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.
  - b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.
  - c. For the first 12 months of operation following the issuance of this permitstartup of this emissions unit, an identification of each month during which the coating usage exceeded the maximum cumulative coating usage limitation specified in Section B.2., and the actual cumulative coating usage for each such month.
  - d. An identification of each month during which the rolling, 12-month coating usage exceeded the 3860 lbs VOC 576 gallons rolling, 12-month summation limitation, and the actual rolling, 12-month coating usage summation for each such month.
  - e. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 1.93 TPY rolling, 12-month summation limitation, and the actual rolling, 12-month emission summation for each such month.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - 1.a Emission Limitation -  
6.7 lbs VOC/hr, excluding cleanup materials  
  
Applicable Compliance Method -  
Compliance shall be based upon the maximum hourly coating usage rate and the maximum VOC content.

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- 1.b Emission Limitation -  
1.93 TPY VOC, including cleanup materials, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirement specified in Sections C.1. and C.3. of this permit.
  
- 1.c Emission Limitation -  
9.9 TPY of an individual HAP, based on a 12-month rolling summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
  
- 1.d Emission Limitation -  
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit.
  
- 1.e Emission Limitation -  
3860 lbs coating VOC576 gallons coating/year, as a rolling 12-month summation  
  
Applicable Compliance Method -  
Compliance shall be based upon the record keeping requirements specified in Sections C.1. and C.3. of this permit.

**F. Miscellaneous Requirements**

- 1. The terms and conditions from Section A.2.b., Section B.1., Section B.2., Section C.1., Section C.2., and Section D.1. are federally enforceable.

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