

1

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

**GENERAL PERMIT CONDITIONS**

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio 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 Ohio Administrative Code

2

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

(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 prove to be inadequate or cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### 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.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### 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.

3

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

4

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

5

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Snyder Collision Inc** located in **Erie** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>		<u>Source Identification Description</u>
R001	R001	Coating operation
	Cont'd	for an auto body repair facility

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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BAT  
Determination

Use of HVLP  
spray guns,  
use of exhaust  
filters for PE  
control,  
compliance  
with Ohio  
EPA's Air  
Toxics Policy  
and compliance  
with the  
Additional  
Special Terms  
and Conditions  
of this permit



Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

- \* The emissions limitations based on these applicable rules are less stringent than the limitations established pursuant to OAC rule 3745-31-05.

#### SUMMARY

##### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	9.31
PE	0.09

#### REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

#### WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

#### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

#### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

#### **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.

#### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

##### **A. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS**

1. No additional emission limitations and/or control requirements other than those identified in the Air Emission Summary section of this permit.

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

**B. OPERATIONAL RESTRICTIONS**

1. This permit allows for the use of the coating and clean up materials specified by the permittee in PTI number 03-3005. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and clean up material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1-hour maximum ground level concentration to the MAGLC. The following table summarizes the results of the modeling for each pollutant:

<u>Pollutant</u>	<u>TLV</u> <u>(ug/m<sup>3</sup>)</u>	<u>Maximum</u> <u>Hourly</u> <u>Emission</u> <u>Rate</u> <u>(lbs/hr)</u>	<u>Predicted</u> <u>1-Hour</u> <u>Maximum</u> <u>Ground-Level</u> <u>Concentration</u> <u>at the</u> <u>Fenceline</u> <u>(ug/m<sup>3</sup>)</u>	<u>Maximum</u> <u>Acceptable</u> <u>Ground-Level</u> <u>Concentration</u> <u>(MAGLC)</u> <u>(ug/m<sup>3</sup>)</u>
naphthalene*	52,000	8.0	186.6	1,238.1

\*Naphthalene has the lowest TLV of all of the individual solvent components. The dispersion modeling was conducted assuming that all of the emissions were naphthalene. As the unit was determined to be in compliance with Ohio EPA's Air Toxics Policy by using the worst-case solvent component, the unit would then comply with the Policy for each individual solvent component.

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office are required:

- a. any change in the composition of the coatings or

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

clean up materials, or the use of new coatings or clean up 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 specified in the above table.

- b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table; and,
  - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.
2. The permittee shall only employ clean up materials in emissions unit R001 which are not photochemically reactive. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C) (5).

**C. MONITORING AND/OR RECORDKEEPING REQUIREMENTS**

1. The permittee shall collect and record the following information for each day for emissions unit R001:
  - a. the company identification for each coating material employed;
  - b. the number of gallons of each coating material employed;
  - c. the OC content of each coating material, in pounds/gallon;
  - d. the total OC emission rate for all coating materials, in pounds/day;
  - e. the total number of hours the emissions unit was

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

in operation; and,

- f. the average hourly OC emission rate for all coating materials, in pounds/hour (average) [d/e].

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

- 2. The permittee shall collect and record the following information each month for the purpose of determining OC emissions from clean up operations in emissions unit R001:
  - a. the company identification for each nonphotochemically reactive cleanup material employed;
  - b. the number of gallons of each nonphotochemically reactive cleanup material employed;
  - c. the OC content of each nonphotochemically reactive cleanup material, in pounds/gallon; and,
  - d. the total OC emission rate for all nonphotochemically reactive cleanup materials, in pounds/month.

**D. REPORTING REQUIREMENTS**

- 1. The permittee shall submit annual deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly OC emissions from the coating materials exceeded 8.0 pounds, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the OC

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

emissions from the coating materials exceeded 40.0 pounds, and the actual OC emissions for each such day; and,

- c. an identification of each month during which the OC emissions from the clean up materials exceeded 335.0 pounds, and the actual OC emissions for each such month.

The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. TESTING REQUIREMENTS**

- 1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation

From coating material usage in emissions unit R001 - 8.0 pounds OC/hour, 40.0 pounds OC/day, 7.3 tons/year

Applicable Compliance Method

Compliance with the hourly, daily and annual OC emission limitations shall be based upon the recordkeeping specified in section C.1 of the Additional Special Terms and Conditions of this permit.

- b. Emission Limitation

from clean up material usage in emissions unit R001 - 335.0 pounds OC/month, 2.01 tons/year

Applicable Compliance Method

Compliance with the monthly and annual OC emission limitations shall be based upon the recordkeeping specified in section C.2 of the Additional Special Terms and Conditions of this permit.

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

c. Emission Limitation

from coating material usage in emissions unit R001  
- 0.02 pound PE/hour, 0.09 ton/year

Applicable Compliance Method

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = Particulate emissions rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with the test methods and procedures in USEPA Method 5, which is located in 40 CFR Part 60, Appendix A.

d. Emission Limitation

visible PE from emissions unit R001 shall not exceed 0 percent opacity, as a six-minute average

Applicable Compliance Method

Compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in USEPA Method 9, which is located in 40 CFR Part 60, Appendix A.

**F. MISCELLANEOUS REQUIREMENTS**

15

Facility Name: **Snyder Collision Inc**

Application Number: **03-3005**

Date: **July 8, 1998**

1. None.