



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

10/15/2013

Certified Mail

Sherry Banner  
Eagle Specialty Vehicles. LLC dba Eagle Coach Company  
3344 STATE ROUTE 132  
AMELIA, OH 45102

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1413010362  
Permit Number: P0115233  
Permit Type: Initial Installation  
County: Clermont

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Clermont Sun. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
SWOQA; Indiana; Kentucky





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Eagle Specialty Vehicles wishes to install a new automotive-type paint spray booth (emissions unit K011) to replace the existing automotive-type paint spray booth (emissions unit K003). Therefore, a new permit will be required pursuant to Ohio Administrative Code (OAC) rule 3745-31-01(UUU), "New Source" definition (The replacement of an entire air contaminant source is considered a new source.) and OAC rule 3745-31-02, "Applicability, requirements, and obligations". The new paint booth will retain the existing hazardous air pollutants (HAP) and volatile organic compounds (VOC) emission limitations for the facility.

3. Facility Emissions and Attainment Status:

Eagle Specialty Vehicles is currently a synthetic minor facility located in Clermont County.

Clermont County is in attainment for particulate matter (PM), particulate matter 10 microns or less in diameter (PM10), particulate matter 2.5 microns or less in diameter (PM2.5), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO). Clermont County is in non-attainment for ozone (VOC is a precursor to ozone).

4. Source Emissions:

Emissions unit K011 will become a synthetic minor by limiting the emissions of HAPs to 24.9 tons per year for any combination of HAPs and 9.9 tons per year for any single HAP to avoid being subject to both Title V operating permit and OAC rule 3745-31-28, "Review of major stationary sources of hazardous air pollutants requiring MACT determinations" requirements. It is noted that emissions unit K011 may be subject to an area MACT {also known as the generally achievable control technology (GACT)}. However, at this time, Ohio EPA does not have authority to enforce this standard.

VOC emissions will be limited to 0.39 ton per month, averaged over a 12-month rolling period, as best available technology (BAT) pursuant to Ohio EPA's "August 30, 2013, "BAT Requirements for Permits Issued On or After October 1, 2013" (specifically 4.f. on page 10 and question number 14 on page 17 of the guidance which requires the use of "dual BAT language" and the use of ongoing compliance obligation that includes monitoring, record keeping, and reporting to verify ongoing compliance with BAT under section 4.f. on page 10 of the "August 30, 2013, "BAT Requirements for Permits Issued On or After October 1, 2013".

Voluntary restrictions limiting usage and VOC content for coatings and cleanup materials restrict VOC emissions to less than 10 tons per year pursuant to Ohio EPA's "Senate Bill (SB) Best Available Technology (BAT) Questions and Answers – March, 2008", and "Permit Processing After U.S. District Court < 10 Ton/Yr. Exemption Decision" of February 19, 2010.



5. Conclusion:

Per the record keeping and reporting requirements of this permit will ensure compliance with the HAP and VOC emission limitations and thereby showing compliance with the detailed strategy listed under the "Source Emissions" section of this permit strategy write up and securing federally enforceable terms to avoid both Title V operating permit and OAC rule 3745-31-28 requirements.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	4.68

PUBLIC NOTICE  
10/15/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Eagle Specialty Vehicles. LLC dba Eagle Coach Company  
3344 STATE ROUTE 132,  
Amelia, OH 45102  
Clermont County  
FACILITY DESC.: Automotive Body, Paint, and Interior Repair and Maintenance  
PERMIT #: P0115233  
PERMIT TYPE: Initial Installation  
PERMIT DESC: Initial PTIO for installation of automotive style paint booth.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Alberta Mellon, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for**

**Eagle Specialty Vehicles. LLC dba Eagle Coach Company**

Facility ID:	1413010362
Permit Number:	P0115233
Permit Type:	Initial Installation
Issued:	10/15/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Eagle Specialty Vehicles, LLC dba Eagle Coach Company

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**Draft Permit-to-Install and Operate**  
Eagle Specialty Vehicles. LLC dba Eagle Coach Company  
**Permit Number:** P0115233  
**Facility ID:** 1413010362  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1413010362  
Application Number(s): A0048503  
Permit Number: P0115233  
Permit Description: Initial PTIO for installation of automotive style paint booth.  
Permit Type: Initial Installation  
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 10/15/2013  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Eagle Specialty Vehicles. LLC dba Eagle Coach Company  
3344 STATE ROUTE 132  
Amelia, OH 45102

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



**Draft Permit-to-Install and Operate**  
Eagle Specialty Vehicles, LLC dba Eagle Coach Company  
**Permit Number:** P0115233  
**Facility ID:** 1413010362  
**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0115233

Permit Description: Initial PTIO for installation of automotive style paint booth.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	Drive-through Paint Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
Eagle Specialty Vehicles. LLC dba Eagle Coach Company  
**Permit Number:** P0115233  
**Facility ID:** 1413010362  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Draft Permit-to-Install and Operate**  
Eagle Specialty Vehicles. LLC dba Eagle Coach Company  
**Permit Number:** P0115233  
**Facility ID:** 1413010362  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 2., 3., 4., and 5.
2. The allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Automotive Style Paint Booth), K002 (Automotive Refinishing Primer Coating Booth), K004 (Subassembly Operations Station), K009 (Limousine Coating Booth), K010 (Limousine Touch-up Booth), K011 (Automotive Style Paint Booth) and all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2:
  - a) The name and identification number of each coating employed.
  - b) The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
  - c) The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum of all individual HAP contents from (b)].
  - d) The number of gallons of each coating 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 [sum all the individual HAP contents from (f)].
  - h) The number of gallons of each cleanup material employed [the total number of gallons of each cleanup material employed less the number of gallons of each cleanup material collected for reuse and disposal].



- i) The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times the emissions factor or overall control efficiency\*\* (if applicable) for each coating plus the sum of (f) times (h) for each cleanup material plus individual HAP emissions from any de minimus, registration status and/or permit exempt emissions unit at the facility].
- j) The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times the emissions factor or overall control efficiency\*\* (if applicable) for each coating plus the sum of (g) times (h) for each cleanup material plus combined HAP emissions from any de minimus, registration status and/or permit exempt emissions unit at the facility].
- k) The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- l) The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Southwest Ohio Air Quality Agency. This information does not have to be kept on a individual emissions unit basis.

\*\* Overall control efficiency shall be from the most recent performance test that demonstrated that the emissions unit was in compliance.

- 4. The permittee shall submit deviation (excursion) reports which identify any exceedance of the rolling, 12-month HAP emission limitations outlined in 2.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- 5. Compliance with the Emissions Limitations and/or Control Requirements specified in 2. of these terms and conditions shall be determined in accordance with the following methods:

- a) Emission Limitation:

9.9 TPY for any individual HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations in 2. shall be demonstrated by the record keeping in 3.



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Eagle Specialty Vehicles. LLC dba Eagle Coach Company  
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6. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>



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Eagle Specialty Vehicles. LLC dba Eagle Coach Company  
**Permit Number:** P0115233  
**Facility ID:** 1413010362  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. K011, Automotive style paint booth**

**Operations, Property and/or Equipment Description:**

Automotive Style Paint Booth

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. b)(1)g., d)(2), d)(3), d)(4), d)(5) and e)(1).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)c.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/01	0.39 ton of VOC per month, averaged over a 12-month rolling period.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D)	See Sections B.2. thru B.5.
d.	OAC rule 3745-31-05(F)	See b)(2)a., b)(2)c., b)(2)d., c)(1) and c)(2).
e.	OAC rule 3745-17-11(C)	Exempt, pursuant to OAC rule 3745-17-11(A)(1)(k).
f.	OAC rule 3745-21-09(U)(2)(d)	Exempt from the requirements of OAC rule 3745-21-09(U)(1), as outlined in OAC rule 3745-21-09(U)(2)(d).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	OAC rule 3745-114	See d)(2), d)(3), d)(4), d)(5) and e)(1).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install and Operate (PTIO) P0115233 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. VOC content limits outlined in terms b)(2)c. and b)(2)d.; and
- ii. The gallon usage limits outlined in terms c)(1) and c)(2).
- c. The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.75 pounds of VOC per gallon of coating, as applied.
- d. The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 7.1 pounds of VOC per gallon of cleanup material.

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit shall not exceed 1040 gallons.
- (2) The maximum annual cleanup material usage for this emissions unit shall not exceed 313 gallons.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month:
  - a. The name and identification number of each coating and cleanup material employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The VOC content of each coating in pounds per gallon, as applied
  - d. The total volume, in gallons, of each cleanup material employed.
  - e. The VOC content of each cleanup material in pounds per gallon.
  - f. The total VOC emissions rate for all coatings and cleanup materials employed, in pounds per month [(b. x c.) + (d. x e.)].

These records shall be summarized at the end of each month, to demonstrate compliance with the 12-month rolling period VOC emission rate in b)(1)a.

- (2) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), K011, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological



Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “10” hours per day and “5” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: xylene w/ option\* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 43,600 (\*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 0.5 (\*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 53.56

MAGLC (ug/m3): 6228.5

Toxic Contaminant: methyl n-amyl ketone w/ option\* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 23,350 (\*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 0.32 (\*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 34.26

MAGLC (ug/m3): 3335.7

The permittee, has demonstrated that emissions of xylene and methyl n-amyl ketone, from emissions unit(s) K011, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).



- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and



- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:  
  
b)(1)a., b)(2)c., b)(2)d., c)(1) and c)(2).
    - b. the probable cause of each deviation (excursion);
    - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
    - d. the magnitude and duration of each deviation (excursion).
- If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
- The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.39 ton of VOC per month, averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the 12-month rolling period limitation shall be demonstrated by the record keeping in d)(1).

(2) Compliance with the VOC content limitations in b)(2)c. and b)(2)d. shall be based upon the record keeping requirements as specified in d)(1).

(3) USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(4) Compliance with the usage limitations in c)(1) and c)(2) shall be based upon the record keeping as specified in d)(1).

g) Miscellaneous Requirements

(1) None.