



10/25/2013

Certified Mail

Lily Cheng
Ritchie Bros. Auctioneers (America) Inc.
4000 Pine Lake Rd.
Lincoln, NE 68516

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

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

Facility ID: 0812090591
Permit Number: P0109239
Permit Type: Renewal
County: Clark

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, Springfield News 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 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 Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

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 Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

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

PUBLIC NOTICE

10/25/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Ritchie Bros. Auctioneers (America) Inc.

200 Ritchie Rd.,

South Vienna, OH 45369

Clark County

FACILITY DESC.: All Other Support Services

PERMIT #: P0109239

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO renewal permitf for K001 - miscellaneous metal parts paint booth and P001 - abrasive blasting booth with baghouse

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: Christopher Clinefelter, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280. Ph: (937)225-4435



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Ritchie Bros Auctioneers (America) Inc., 0812090591

The facility will be classified as a non-Title V facility (synthetic minor) for VOCs and HAPs. The company is a large global auctioneer of equipment and machinery. Essentially, the company takes consigned equipment, such as construction and farm equipment, and refurbishes them by pressure washing (no emissions), abrasive blasting (P001) and painting (K001). Ritchie Bros Auctioneers submitted a renewal application for the Paint booth and abrasive blasting booth on 12/29/11.

3. Facility Emissions and Attainment Status:

Ritchie Bros Auctioneers (America) Inc., 0812090591, is located in Clark County, which is attainment for all major criteria pollutants. The emissions were reduced from 51 tons of VOC to 39.4 tons, based on a new paint supplier and a reduction in the annual coating usage. They also have a new synthetic minor to avoid TV and MACT limit for HAPs of 9.9/24.9 tpy.

4. Source Emissions:

The facility takes consigned equipment, such as construction and farm equipment, and refurbishes them by pressure washing (no emissions), abrasive blasting (P001) and painting (K001).

P001- Nothing has changed with the abrasive blasting operation since the original permit. The blasting occurs in a completely enclosed booth. Particulate emissions are vented to a baghouse with an outlet grain loading of 0.02 gr/dscf. Blasting garnet is also recycled in the booth via a recovery conveyor system located under the booth. P001 results in a permitted allowable of 36.8 tons of PE per year. The stack has a 5% VE limit as BAT. Particulate emissions estimates are provided in the calculations. OAC rules 3745-17-07(A)(1) and 3745-17-11(B)(1) apply to this source. The allowable emissions rates per OAC rule 3745-17-11(B)(1) are as follows:

$$\text{PWR} = \text{Garnet Blasting Weight (2592 lbs/hr)} + \text{Weight of Equipment Blasted (over 4000 lbs/hr)}$$
$$= > 6,000$$

The weight of equipment blasted is well over 4000 lbs/hr. The equipment is heavy farm machinery and construction equipment.

Table I: AER @ PWR 6,000 lbs/hr (3 tons/hr) = 8.56 lbs/hr



Uncontrolled Mass Rate of Emission (UMRE) = 2592 lbs/hr (assumed worst-case)
Figure II: AER @ UMRE 2592 lbs/hr (1.296 ton/hr) = $0.5782 * 2592^{0.6456} = 92.5$ lbs/hr

K001- the paint booth has a 39.4 ton per year limit for VOCs and is based on a coating usage restriction of 22,500 gallons based upon a rolling, 12 month summation. Vehicle and equipment painting occur in a spray booth with dry filters. The coatings comply with OAC rule 3745-21-09(U)(1)(c) standard of 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating. OAC rule 3745-21-01(B)(19) defines "extreme performance coating" as a coating designed for exposure to any of the following: year-round outdoor weather, temperatures consistently above two hundred three degrees Fahrenheit, detergents, scouring, solvents, corrosive materials, corrosive atmospheres or similar harsh conditions. These vehicles will be exposed to year-round outdoor weather; thus, the coatings are considered extreme performance coatings.

In addition, OAC rule 3745-21-18 applies to the paint booth. The requirements of this rule shall apply to all commercial motor vehicle and mobile equipment refinishing operations (sources), regardless of the date of construction or modification, that are located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties. The facility uses airless and HVLP paint sprayers.

Air Toxics

Since this permit is lowering the gallon/yr restriction to avoid HAPs and the paint supplier has changed (thus the need for the restriction for xylene), it seemed reasonable to address and update the air toxics. K001 was modeled by the consultants using SCREEN3, using the maximum hourly air toxic emission rate of 25 pounds of xylene /hr. The TLV for xylene is 434,192 ug/m³; therefore, the MAGLC was 43,419 ug/m³. The SCREEN3 result was 13,660, so the MAGLC was not exceeded. Thus, K001 is in compliance with the air toxic policy. The new air toxics language was added to this permit.

5. Conclusion:

With a new paint supplier, the facility was able to reduce the amount of coating usage from 28,000 gallons to 22,500 gallons which results in keeping the individual HAP limits below 10 tons, thus avoiding MACT and TV permit requirements. The air toxics was also updated due to the new paint supplier. BAT is compliance with applicable OAC rules through the use of compliant coatings, emission limitations, monitoring, record keeping and reporting requirements. No fee for a renewal.

This permit will be recommended as a FEPTIO and for draft issuance because of the new SMTV restriction of 22,500 gallons to keep the PTE for xylene (HAP) below 10 tons. The original SM restriction for VOC still applies but has been reduced from 51 tons to 39.4 tons per year.

6. Please provide additional notes or comments as necessary:

As noted in their permit application, the company has changed paint suppliers and the annual emissions limitations have decreased. Based on their latest 2006 PTOs, the PTE for VOC emissions is based on 3.5lb VOC/gallon x 13 gal/hr. With a coating restriction of 28,500



gal/yr, this calculates to 51 tons of VOC and is the maximum the paint booth can use. The 51 tons includes 1 ton for cleanup. The previous permits had diethylene glycol butyl ether as the only HAP; whose potential emissions were 2.55 TPY. So TV and MACT requirements were not of concern. Based on the application and the new paint supplier some of the air toxics and HAPs have changed. Because of the change in the paint supplier, the facility had originally requested a 10,500 gallon/yr limit (down from 28,500 gal/yr) to limit the xylene emissions to 9.8 TPY in order to avoid TV permitting requirements for HAPs. However, due to some typos in the calc sheet, RBA discovered that a certain coating was not used when they checked with the facility. This coating, Nason 2k had a large amount of xylene, which was why the coating was not used anymore. Currently, the xylene emissions are based on 13 gal/hr x 8760 and this equates to 85 tons. This is not representative of their operations, but is the PTE. This brought the xylene (single HAP) emissions down from 9.8 tons to 4.39 tons. The facility then requested to bump the coating restriction up to 22,500 gallons which would keep the xylene emissions at 9.41 tons and out of TV permitting requirements. Instead of exploring any bottlenecks, such as drying time, that could decrease the PTE, the facility has requested the overall limit of 22,500 gallons/yr. The new permitted VOC limit will equate to 39.4 tons of VOC emissions (this does not include any cleanup as they run the last job's paint through the gun as a base coat). If cleanup is performed, they use acetone, which is not a VOC. Thus, major new source review, TV and MACT does not apply (synthetic minor).

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	36.8
VOC	39.4
HAP	9.9 / 24.9



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Ritchie Bros. Auctioneers (America) Inc.**

Facility ID:	0812090591
Permit Number:	P0109239
Permit Type:	Renewal
Issued:	10/25/2013
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
Ritchie Bros. Auctioneers (America) Inc.

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Draft Permit-to-Install and Operate

Ritchie Bros. Auctioneers (America) Inc.

Permit Number: P0109239

Facility ID: 0812090591

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0812090591
Application Number(s): A0042585
Permit Number: P0109239
Permit Description: FEPTIO renewal permit for K001 - miscellaneous metal parts paint booth and P001 - abrasive blasting booth with baghouse
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/25/2013
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:

Ritchie Bros. Auctioneers (America) Inc.
200 Ritchie Rd.
South Vienna, OH 45369

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:

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

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

Ritchie Bros. Auctioneers (America) Inc.

Permit Number: P0109239

Facility ID: 0812090591

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0109239

Permit Description: FEPTIO renewal permit for K001 - miscellaneous metal parts paint booth and P001 - abrasive blasting booth with baghouse

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

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

K001

Miscellaneous Metal Parts Paint Booth
08-04768
Not Applicable

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

P001

Abrasive Blasting Booth with Baghouse
08-04768
Not Applicable



Draft Permit-to-Install and Operate
Ritchie Bros. Auctioneers (America) Inc.
Permit Number: P0109239
Facility ID: 0812090591
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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 Regional Air Pollution Control 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 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 emission 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.

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



Draft Permit-to-Install and Operate

Ritchie Bros. Auctioneers (America) Inc.

Permit Number: P0109239

Facility ID: 0812090591

Effective Date: To be entered upon final issuance

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.



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Ritchie Bros. Auctioneers (America) Inc.

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B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

Ritchie Bros. Auctioneers (America) Inc.

Permit Number: P0109239

Facility ID: 0812090591

Effective Date: To be entered upon final issuance

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) None.



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Ritchie Bros. Auctioneers (America) Inc.
Permit Number: P0109239
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C. Emissions Unit Terms and Conditions



1. K001, Miscellaneous Metal Parts Paint Booth

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts 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)e.
 - (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. None.
- 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) PTI 08-04768, issued 9/14/2006	The requirements of this rule also include compliance with therequirements of OAC rules 3745-31-05(D) and 3745-21-9(U)(1)(c).
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid New Source Review, Title V, and MACT)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 39.4 TPY from coatings basedupon a rolling, 12-month summation. The hazardous air pollutant (HAP) emissions from this emissions unit shall not exceed 9.9 tons for an individual HAP or 24.9 tons for any combination of HAPs, from coatings, based upon a rolling, 12-month summation.
c.	OAC rule 3745-21-09(U)(1)(c)	The VOC content of the coatingemployed shall not exceed 3.5



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		lbs per gallon, as applied, excluding water and exempt solvents.
d.	OAC rule 3745-21-18(C)	See c)(2) through c)(5).
e.	ORC 3704.03(F)(4)(d) and OAC rule 3745-114, Compliance with the Ohio EPA Air Toxics Policy	See d)(4) through d)(7) and e)(5).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The annual coating usage for this emissions unit shall not exceed 22,500 gallons, based upon a rolling, 12-month summation.

(2) The permittee shall use one or more of the following application techniques, in accordance with manufacturer's specifications, to apply any coating containing a VOC as a pretreatment, primer, sealant, basecoat, clear coat, or topcoat to mobile equipment for commercial purposes:

- a. flow or curtain coating;
- b. dip coating;
- c. roller coating;
- d. brush coating;
- e. cotton-tipped swab application;
- f. electro-deposition coating;
- g. high volume, low pressure (HVLP) spraying;
- h. electrostatic spray;
- i. airless spray;
- j. air-assisted airless spray; and

Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the Director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone.



- (3) A person at the facility shall be properly trained in the use of an HVLP sprayer, or equivalent application, in accordance with manufacturer's specifications, and the handling of a coating and any solvents used to clean the sprayer.
 - (4) Spray guns used to apply mobile equipment repair and refinishing coatings shall be cleaned by one of the following:
 - a. an enclosed spray gun cleaning system that is kept closed when not in use;
 - b. un-atomized discharge of solvent into a paint waste container that is kept closed when not in use;
 - c. disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; and
 - d. atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.
 - (5) The permittee shall store the following materials in nonabsorbent, non-leaking containers and keep these containers closed at all times when not in use:
 - a. fresh coatings;
 - b. used coatings;
 - c. solvents;
 - d. VOC-containing additives and materials;
 - e. VOC-containing waste materials; and
 - f. cloth, paper, or absorbent applicators moistened with any of the items listed in this subsection.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
 - d. the total number of gallons of coating employed, the summation of d)(1)c. for each month, as a rolling 12-month summation.
 - e. the total VOC emissions from all coatings employed, the summation of the products of d)(1)b. x d)(1)c. for all the coatings applied during the month, divided by 2,000 pounds; in tons, as a rolling 12-month summation.



- (2) The permittee shall collect and record each month the following information for the entire facility:
- a. the name and identification number/code of each coating, thinner, and additive, and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material applied and identified in d)(3)a. and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, and other material applied during the month;
 - d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(3)b. x d)(3)c. for all the materials applied during the month, divided by 2,000 pounds;
 - e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(3)d.;
 - f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(3)d., for the present month plus the previous 11 months of operation, in ton(s); and
 - g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(3)e., for the present month plus the previous 11 months of operation, in ton(s).

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 District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- (3) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), K001, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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., "8" 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: Xylenew/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 434.2(*for which toxic, if using worst case)

Maximum Hourly Emission Rate (lbs/hr): 25.0(*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13,660

MAGLC (ug/m3): 43,419.2

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K001, 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).

- (4) 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.

- (5) 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.

- (6) 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 submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations and operational restrictions 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:
 - i. all exceedances of the rolling 12-month coating usage;
 - ii. all exceedances of the rolling 12-month VOC emissions limitation; and,
 - iii. all exceedances of the rolling 12-month HAP emissions limitation.
 - 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).

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- (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 e-Business 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.



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- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (5) 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.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
The VOC content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
Applicable Compliance Method -
Compliance shall be based on the record keeping specified in d)(1).
 - b. Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 39.4 TPY from coatings, based upon a rolling, 12-month summation.
Applicable Compliance Method -
Compliance shall be based on the record keeping specified in d)(1).
 - c. Emission Limitation -
The HAP emissions from this emissions unit shall not exceed 9.9 tons for an individual HAP or 24.9 tons for any combination of HAPs, from coatings, based upon a rolling, 12-month summation.
Applicable Compliance Method -
Compliance shall be based on the record keeping specified in d)(2).
- g) Miscellaneous Requirements
- (1) None.



2. P001, Abrasive Blasting Booth with Baghouse

Operations, Property and/or Equipment Description:

Abrasive Blasting 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. None.

(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. None.

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) PTI 08-04768, issued 9/14/2006	The particulate emissions (PE) from this emissions unit shall not exceed 8.4 lbs/hr and 36.8 tons per year (TPY). Visible PE from any stack shall not exceed 5 percent opacity as a six-minute average
b.	OAC rule 3745-17-07(A)(1)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The PE limitations were established 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 these limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the abnormal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving



this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (2) 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 e-Business 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.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation -

The PE from this emissions unit shall not exceed 8.4 lbs/hr.

Applicable Compliance Method -

Compliance shall be determined by multiplying the PE grain loading from the baghouse(0.020 gr/dscf) by the stack air flow rate (49,000 cfm), by 60 minutes per hour and dividing by 7,000 grains per pound.

b. Emission Limitation -

The PE from this emissions unit shall not exceed 36.8 TPY.

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly PE rate (8.4 lbs/hr) by the maximum annual operating hours (8,760 hrs/yr) and dividing by 2,000 lbs/ton.

c. Emission Limitation -

The visible PE from any stack shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method -

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).



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g) Miscellaneous Requirements

(1) None.