



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

08/13/01

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

K002 (Truck Topcoating Booth #2)

Truck Topcoating Booth #2

Buckeye Truck Equipment (01-25-04-2343)
Daniel Oliver
3 Acorn Drive
Oakwood Village, OH 44146

Dear Daniel Oliver:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Central District Office at (614) 728-3778.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Central District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date 08/13/01

Expiration Date 08/13/06

This document constitutes issuance to

Facility ID: 01-25-04-2343
Buckeye Truck Equipment
939 E. Starr Ave.
Columbus, OH 43201

of a permit to operate for:

K002 (Truck Topcoating Booth #2)
Truck Topcoating Booth #2

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in black ink, appearing to read "Christopher Jones", written over a horizontal line.

Christopher Jones
Director

Part I: General Terms and Conditions

1 Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner

- a Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit.

Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Truck topcoating booth number 2	OAC rule 3745-31-05 PTI # 01-6762	Maximum hourly VOC emissions from K002 shall not exceed 14 pounds VOC per hour.
		Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month.
		Emissions of any single HAP and total HAPs from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month, and 2.04 tons per month, respectively.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11 and 3745-21-09(U)(1).
	OAC rule 3745-21-09(U)(1)(c)	For any sealer or other primer employed, the VOC content shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(A)(4)	Allowable hourly particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-09(U)(2)(d)	This exemption applies only to the topcoat coatings employed and is based upon a maximum production rate of 35 vehicles or vehicle components per day.
	OAC rule 3745-17-07(A)(1)	See B.1. Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

B. Operational Restrictions

1. The permittee shall not coat more than 35 vehicles or vehicle components per day in this emissions unit
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the number of vehicles or vehicle components coated each day
2. The permittee shall collect and record the following information each month for the purpose of determining VOC, individual HAP, and total HAPs emissions for K002, K003, K004, K005, K006 and K007, combined:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner, and cleanup material employed.
 - b. The VOC content of each coating, thinner, and cleanup material employed, in pounds per gallon.
 - c. The VOC content of each sealer and each other primer (i.e., each non-topcoat coating), in pounds per gallon excluding water and exempt solvents.
 - d. The total HAPs content of each coating, thinner, and cleanup material employed, in pounds per gallon.
 - e. The individual HAP content of each coating, thinner, and cleanup material employed, in pounds per gallon.
 - f. The number of gallons of each coating, thinner, and cleanup material employed.
 - g. The total VOC emissions from all coatings, thinners and cleanup materials employed, in tons.
 - h. The total HAPs emissions from all coatings, thinners, and cleanup materials employed, in tons.
 - i. The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in tons.
3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner and cleanup material employed.
 - b. The VOC content of each coating, thinner and cleanup material, in pounds per gallon
 - c. The number of gallons of each coating, thinner and cleanup material employed
 - d. The total VOC emissions from all coatings, thinners and cleanup materials employed, in pounds
 - e. The total number of hours this emissions unit was in operation.
 - f. The average hourly VOC emissions rate, in pounds.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

Reporting Requirements

1. The permittee shall notify the Director of Ohio EPA in writing of each daily record showing any exceedance of the VOC content limitation for sealers and other primers and/or of the restriction on the number of vehicles or vehicle components coated per day. Each notification shall be sent to the Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports to the Director of Ohio EPA that identify all exceedances of the hourly emission limitation for VOC and the monthly emission limitations for VOC, individual HAP, and combined HAPs. Each report shall be sent to the Central District Office within 45 days after the exceedance occurs.

D. Reporting Requirements (continued)

3. The permittee shall notify the Director (the Central District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. Each notification shall be sent to the Central District Office within 45 days after the event occurs.
4. The permittee shall also submit annual reports to the Central District Office that specify the following information:
 - a. The total VOC emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - b. The total HAPs emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - c. The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.

These reports shall be submitted to the Central District Office by January 31 of each year and shall include information for each month during the previous calendar year (i.e., January through December).

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emissions Limitation:
Maximum hourly VOC emissions shall not exceed 14 pounds VOC per hour.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be demonstrated by the record keeping in section C.3. Formulation data shall be used to determine the VOC contents of the thinners and cleanup materials. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emission Limitation: For any sealer or other primer employed, the VOC content shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method: Compliance with the VOC content limitation shall be demonstrated by the record keeping in section C.2. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.c Emissions Limitation:
Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month. Individual HAP and combined HAPs emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month and 2.04 tons per month, respectively.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the record keeping in section C.2. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials.

E. Testing Requirements (continued)

- 1.d Emissions Limitation:
Maximum hourly particulate emissions shall not exceed 0.551 pound PE per hour.

Applicable Compliance Method:

Compliance with the particulate emission limitation may be demonstrated by using the following equation:

$E \text{ (lbs/hr)} = \text{maximum coating application rate (gal/hr)} \times \text{coating solids content (lbs/gal)} \times (1-TE) \times (1-CE)$
where,

E = particulate emission rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for HVLP spray guns)

CE = control efficiency of the control equipment (95% for panel filter)

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.e Emission Limitation:
Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the opacity limitation shall be determined in accordance to OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable:
A - F.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

08/13/01

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate
K003 (Truck Topcoating Booth #3)
Truck Topcoating Booth #3

Buckeye Truck Equipment (01-25-04-2343)
Daniel Oliver
3 Acorn Drive
Oakwood Village, OH 44146

Dear Daniel Oliver:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Central District Office at (614) 728-3778.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Central District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 08/13/01

Expiration Date: 08/13/06

This document constitutes issuance to:

Facility ID: 01-25-04-2343
Buckeye Truck Equipment
939 E. Starr Ave.
Columbus, OH 43201

of a permit to operate for:

K003 (Truck Topcoating Booth #3)
Truck Topcoating Booth #3

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1 Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a** Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b** Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Truck topcoating booth number 3	OAC rule 3745-31-05 PTI # 01-6762	Maximum hourly VOC emissions from K003 shall not exceed 14 pounds VOC per hour. Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month. Emissions of any single HAP and total HAPs from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month and 2.04 tons per month, respectively. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11 and 3745-21-09(U)(1).
	OAC rule 3745-21-09(U)(1)(c)	For any sealer or other primer employed, the VOC content shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(A)(4)	Allowable hourly particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-09(U)(2)(d)	This exemption applies only to the topcoat coatings employed and is based upon a maximum production rate of 35 vehicles or vehicle components per day.
	OAC rule 3745-17-07(A)(1)	See B.1. Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

B. Operational Restrictions

1. The permittee shall not coat more than 35 vehicles or vehicle components per day in this emissions unit.
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the number of vehicles or vehicle components coated each day.
2. The permittee shall collect and record the following information each month for the purpose of determining VOC, individual HAP, and total HAPs emissions for K002, K003, K004, K005, K006 and K007, combined:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner, and cleanup material employed.
 - b. The VOC content of each coating, thinner, and cleanup material employed, in pounds per gallon.
 - c. The VOC content of each sealer and each other primer (i.e., each non-topcoat coating), in pounds per gallon excluding water and exempt solvents.
 - d. The total HAPs content of each coating, thinner, and cleanup material employed, in pounds per gallon.
 - e. The individual HAP content of each coating, thinner, and cleanup material employed, in pounds per gallon
The number of gallons of each coating, thinner, and cleanup material employed.
 - g. The total VOC emissions from all coatings, thinners and cleanup materials employed, in tons.
 - h. The total HAPs emissions from all coatings, thinners, and cleanup materials employed, in tons.
 - i. The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in tons.

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each day for this emissions unit
 - a. The name and identification of each coating (including each sealer and each other primer), thinner and cleanup material employed.
 - b. The VOC content of each coating, thinner and cleanup material, in pounds per gallon.
 - c. The number of gallons of each coating, thinner and cleanup material employed.
 - d. The total VOC emissions from all coatings, thinners and cleanup materials employed, in pounds
 - e. The total number of hours this emissions unit was in operation
 - f. The average hourly VOC emissions rate, in pounds.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Director of Ohio EPA in writing of each daily record showing any exceedance of the VOC content limitation for sealers and other primers and/or of the restriction on the number of vehicles or vehicle components coated per day. Each notification shall be sent to the Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports to the Director of Ohio EPA that identify all exceedances of the hourly emission limitation for VOC and the monthly emission limitations for VOC, individual HAP, and combined HAPs. Each report shall be sent to the Central District Office within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the Central District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. Each notification shall be sent to the Central District Office within 45 days after the event occurs.
4. The permittee shall also submit annual reports to the Central District Office that specify the following information:
 - a. The total VOC emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - b. The total HAPs emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - c. The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.

These reports shall be submitted to the Central District Office by January 31 of each year and shall include information for each month during the previous calendar year (i.e., January through December).

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

E Testing Requirements (continued)

- 1.a Emissions Limitation:**
Maximum hourly VOC emissions shall not exceed 14 pounds VOC per hour.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be demonstrated by the record keeping in section C.3. Formulation data shall be used to determine the VOC contents of the thinners and cleanup materials. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emission Limitation:** For any sealer or other primer employed, the VOC content shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method: Compliance with the VOC content limitation shall be demonstrated by the record keeping in section C.2. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.c Emissions Limitation:**
Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month. Individual HAP and combined HAPs emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month and 2.04 tons per month, respectively.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the record keeping in section C.2. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials.

- 1.d Emissions Limitation:**
Maximum hourly particulate emissions shall not exceed 0.551 pound PE per hour.

Applicable Compliance Method:

Compliance with the particulate emission limitation may be demonstrated by using the following equation:

$$E \text{ (lbs/hr)} = \text{maximum coating application rate (gal/hr)} \times \text{coating solids content (lbs/gal)} \times (1-TE) \times (1-CE)$$

where,

E = particulate emission rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for HVLP spray guns)

CE = control efficiency of the control equipment (95% for panel filter)

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.e Emission Limitation:**
Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the opacity limitation shall be determined in accordance to OAC rule 3745-17-03(B)(1).

F Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable:
A - F.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

08/13/01

CERTIFIED MAIL

**RE: Final Chapter 3745-35 Permit To Operate
K004 (Truck Prep Station #1)
Truck Prep Station #1**

Buckeye Truck Equipment (01-25-04-2343)
Daniel Oliver
3 Acorn Drive
Oakwood Village, OH 44146

Dear Daniel Oliver:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Central District Office at (614) 728-3778.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Central District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 08/13/01

Expiration Date: 08/13/06

This document constitutes issuance to

Facility ID: 01-25-04-2343
Buckeye Truck Equipment
939 E. Starr Ave.
Columbus, OH 43201

of a permit to operate for:

K004 (Truck Prep Station #1)
Truck Prep Station #1

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

This permit is granted subject to the conditions attached hereto

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a** Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b** Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Truck prep station number 1	OAC rule 3745-31-05 PTI # 01-6762	Maximum hourly VOC emissions from K004 shall not exceed 5.75 pounds VOC per hour.
		Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month.
		Emissions of any single HAP and total HAPs from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month, and 2.04 tons per month, respectively.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11 and 3745-21-09(U).
	OAC rule 3745-17-11(A)(4)	Allowable hourly particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-09(U)(2)(e)(ii)	Exemption based on maximum coating(s) usage not to exceed 10 gallons each day. See B.1. below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

B. Operational Restrictions

- The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit
- The permittee shall operate the dry filtration system whenever this emissions unit is in operation

C. Monitoring and/or Record Keeping Requirements

- The permittee shall collect and record the total volume, in gallons, of all the coatings employed each day.

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for the purpose of determining VOC, individual HAP, and total HAPs emissions for K002, K003, K004, K005, K006 and K007, combined:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner, and cleanup material employed.
 - b. The VOC content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - c. The total HAPs content of each coating, thinner, and cleanup material employed, in pounds per gallon.
 - d. The individual HAP content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - e. The number of gallons of each coating, thinner, and cleanup material employed
 - f. The total VOC emissions from all coatings, thinners and cleanup materials employed, in tons
 - g. The total HAPs emissions from all coatings, thinners, and cleanup materials employed, in tons
 - h. The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in tons.
3. The permittee shall collect and record the following information each day for this emissions unit
 - a. The name and identification of each coating (including each sealer and each other primer), thinner and cleanup material employed.
 - b. The VOC content of each coating, thinner and cleanup material, in pounds per gallon.
 - c. The number of gallons of each coating, thinner and cleanup material employed
 - d. The total VOC emissions from all coatings, thinners and cleanup materials employed, in pounds
 - e. The total number of hours this emissions unit was in operation
 - f. The average hourly VOC emissions rate, in pounds.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

Reporting Requirements

1. The permittee shall notify the Director of Ohio EPA in writing of any exceedance of the restriction on the number of gallons of coatings applied per day in this emissions unit. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports to the Director of Ohio EPA that identify all exceedances of the hourly emission limitation for VOC and the monthly emission limitations for VOC, individual HAP, and combined HAPs. Each report shall be sent to the Central District Office within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the Central District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Central District Office) within 45 days after the event occurs.

D. Reporting Requirements (continued)

4. The permittee shall also submit annual reports to the Central District Office that specify the following information:
 - a. The total VOC emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - b. The total HAPs emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - c. The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.

These reports shall be submitted to the Central District Office by January 31 of each year and shall include information for each month during the previous calendar year (i.e., January through December).

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emissions Limitation:
Maximum hourly VOC emissions shall not exceed 5.75 pounds VOC per hour.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be demonstrated by the record keeping in section C.3. Formulation data shall be used to determine the VOC contents of the thinners and cleanup materials. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emissions Limitation:
Maximum hourly particulate emissions shall not exceed 0.551 pound PE per hour.

Applicable Compliance Method:

Compliance with the particulate emission limitation may be demonstrated by using the following equation

$$E \text{ (lbs/hr)} = \text{maximum coating application rate (gal/hr)} \times \text{coating solids content (lbs/gal)} \times (1-TE) \times (1-CE)$$

where,

E = particulate emission rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for HVLP spray guns)

CE = control efficiency of the control equipment (95% for panel filter)

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.c Emissions Limitation:
Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month. Individual HAP and combined HAPs emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month and 2.04 tons per month, respectively.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the record keeping in section C.2. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials.

E. Testing Requirements (continued)

- 1.d Emission Limitation:
Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the opacity limitation shall be determined in accordance to OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable:
A - F.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

08/13/01

CERTIFIED MAIL

**RE: Final Chapter 3745-35 Permit To Operate
K005 (Truck Prep Station #2)
Truck Prep Station #2**

Buckeye Truck Equipment (01-25-04-2343)
Daniel Oliver
3 Acorn Drive
Oakwood Village, OH 44146

Dear Daniel Oliver

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Central District Office at (614) 728-3778.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Central District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 08/13/01

Expiration Date: 08/13/06

This document constitutes issuance to:

Facility ID: 01-25-04-2343
Buckeye Truck Equipment
939 E. Starr Ave.
Columbus, OH 43201

of a permit to operate for:

K005 (Truck Prep Station #2)
Truck Prep Station #2

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Truck prep station number 2	OAC rule 3745-31-05 PTI # 01-6762	Maximum hourly VOC emissions from K005 shall not exceed 5.75 pounds VOC per hour. Total VOC emissions from K002, K003, K004, K005, K006, and K007 combined, shall not exceed 4.23 tons VOC per month. Emissions of any single HAP and total HAPs from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month, and 2.04 tons per month, respectively. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11 and 3745-21-09(U).
	OAC rule 3745-17-11(A)(4)	Allowable hourly particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-09(U)(2)(e)(ii)	Exemption based on maximum coating(s) usage not to exceed 10 gallons each day. See B.1. below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

B. Operational Restrictions

- The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit.
- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- The permittee shall collect and record the total volume, in gallons, of all the coatings employed each day

C Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for the purpose of determining VOC, individual HAP, and total HAPs emissions for K002, K003, K004, K005, K006 and K007, combined:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner, and cleanup material employed.
 - b. The VOC content of each coating, thinner, and cleanup material employed, in pounds per gallon.
 - c. The total HAPs content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - d. The individual HAP content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - e. The number of gallons of each coating, thinner, and cleanup material employed
 - f. The total VOC emissions from all coatings, thinners and cleanup materials employed, in tons
 - g. The total HAPs emissions from all coatings, thinners, and cleanup materials employed, in tons.
 - h. The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in tons.
3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner and cleanup material employed.
 - b. The VOC content of each coating, thinner and cleanup material, in pounds per gallon
 - c. The number of gallons of each coating, thinner and cleanup material employed.
 - d. The total VOC emissions from all coatings, thinners and cleanup materials employed, in pounds.
 - e. The total number of hours this emissions unit was in operation
 - f. The average hourly VOC emissions rate, in pounds.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

Reporting Requirements

1. The permittee shall notify the Director of Ohio EPA in writing of any exceedance of the restriction on the number of gallons of coatings applied per day in this emissions unit. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports to the Director of Ohio EPA that identify all exceedances of the hourly emission limitation for VOC and the monthly emission limitations for VOC, individual HAP, and combined HAPs. Each report shall be sent to the Central District Office within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the Central District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Central District Office) within 45 days after the event occurs.

D. Reporting Requirements (continued)

4. The permittee shall also submit annual reports to the Central District Office that specify the following information:
 - a. The total VOC emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - b. The total HAPs emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - c. The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.

These reports shall be submitted to the Central District Office by January 31 of each year and shall include information for each month during the previous calendar year (i.e., January through December).

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emissions Limitation:
Maximum hourly VOC emissions shall not exceed 5.75 pounds VOC per hour.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be demonstrated by the record keeping in section C.3. Formulation data shall be used to determine the VOC contents of the thinners and cleanup materials. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emissions Limitation:
Maximum hourly particulate emissions shall not exceed 0.551 pound PE per hour.

Applicable Compliance Method:

Compliance with the particulate emission limitation may be demonstrated by using the following equation:

$$E \text{ (lbs/hr)} = \text{maximum coating application rate (gal/hr)} \times \text{coating solids content (lbs/gal)} \times (1-TE) \times (1-CE)$$

where,

E = particulate emission rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for HVLP spray guns)

CE = control efficiency of the control equipment (95% for panel filter)

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.c Emissions Limitation:
Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month. Individual HAP and combined HAPs emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month and 2.04 tons per month, respectively.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the record keeping in section C.2. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials.

E. Testing Requirements (continued)

- 1.d Emission Limitation:**
Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the opacity limitation shall be determined in accordance to OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

- 1.** Pursuant to OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable:
A - F.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

08/13/01

CERTIFIED MAIL

**RE: Final Chapter 3745-35 Permit To Operate
K006 (Truck Prep Station #3)
Truck Prep Station #3**

Buckeye Truck Equipment (01-25-04-2343)
Daniel Oliver
3 Acorn Drive
Oakwood Village, OH 44146

Dear Daniel Oliver:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Central District Office at (614) 728-3778.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Central District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 08/13/01

Expiration Date: 08/13/06

This document constitutes issuance to:

Facility ID: 01-25-04-2343
Buckeye Truck Equipment
939 E. Starr Ave.
Columbus, OH 43201

of a permit to operate for:

K006 (Truck Prep Station #3)
Truck Prep Station #3

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3 Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Truck prep station number 3	OAC rule 3745-31-05 PTI # 01-6762	Maximum hourly VOC emissions from K006 shall not exceed 5.75 pounds VOC per hour.
		Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month.
		Emissions of any single HAP and total HAPs from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month, and 2.04 tons per month, respectively.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11 and 3745-21-09(U).
	OAC rule 3745-17-11(A)(4)	Allowable hourly particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-09(U)(2)(e)(ii)	Exemption based on maximum coating(s) usage not to exceed 10 gallons each day. See B.1. below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

B. Operational Restrictions

- The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit
- The permittee shall operate the dry filtration system whenever this emissions unit is in operation

C. Monitoring and/or Record Keeping Requirements

- The permittee shall collect and record the total volume, in gallons, of all the coatings employed each day

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for the purpose of determining VOC, individual HAP, and total HAPs emissions for K002, K003, K004, K005, K006 and K007, combined:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner, and cleanup material employed.
 - b. The VOC content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - c. The total HAPs content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - d. The individual HAP content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - e. The number of gallons of each coating, thinner, and cleanup material employed.
 - f. The total VOC emissions from all coatings, thinners and cleanup materials employed, in tons
 - g. The total HAPs emissions from all coatings, thinners, and cleanup materials employed, in tons.
 - h. The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in tons.
3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner and cleanup material employed.
 - b. The VOC content of each coating, thinner and cleanup material, in pounds per gallon
 - c. The number of gallons of each coating, thinner and cleanup material employed
 - d. The total VOC emissions from all coatings, thinners and cleanup materials employed, in pounds
 - e. The total number of hours this emissions unit was in operation.
 - f. The average hourly VOC emissions rate, in pounds.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Director of Ohio EPA in writing of any exceedance of the restriction on the number of gallons of coatings applied per day in this emissions unit. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports to the Director of Ohio EPA that identify all exceedances of the hourly emission limitation for VOC and the monthly emission limitations for VOC, individual HAP, and combined HAPs. Each report shall be sent to the Central District Office within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the Central District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Central District Office) within 45 days after the event occurs.

D. Reporting Requirements (continued)

4. The permittee shall also submit annual reports to the Central District Office that specify the following information:
 - a. The total VOC emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - b. The total HAPs emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - c. The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.

These reports shall be submitted to the Central District Office by January 31 of each year and shall include information for each month during the previous calendar year (i.e., January through December).

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emissions Limitation:
Maximum hourly VOC emissions shall not exceed 5.75 pounds VOC per hour.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be demonstrated by the record keeping in section C.3. Formulation data shall be used to determine the VOC contents of the thinners and cleanup materials. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- 1.b Emissions Limitation:
Maximum hourly particulate emissions shall not exceed 0.551 pound PE per hour.

Applicable Compliance Method:

Compliance with the particulate emission limitation may be demonstrated by using the following equation:

$$E \text{ (lbs/hr)} = \text{maximum coating application rate (gal/hr)} \times \text{coating solids content (lbs/gal)} \times (1-TE) \times (1-CE)$$

where,

E = particulate emission rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for HVLP spray guns)

CE = control efficiency of the control equipment (95% for panel filter)

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.c Emissions Limitation:
Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month. Individual HAP and combined HAPs emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month and 2.04 tons per month, respectively.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the record keeping in section C.2. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials.

E. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the opacity limitation shall be determined in accordance to OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable:
A - F.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

08/13/01

CERTIFIED MAIL

**RE: Final Chapter 3745-35 Permit To Operate
K007 (Truck Prep Station #4)
Truck Prep Station #4**

Buckeye Truck Equipment (01-25-04-2343)
Daniel Oliver
3 Acorn Drive
Oakwood Village, OH 44146

Dear Daniel Oliver:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Central District Office at (614) 728-3778.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Central District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 08/13/01

Expiration Date: 08/13/06

This document constitutes issuance to:

Facility ID: 01-25-04-2343
Buckeye Truck Equipment
939 E. Starr Ave.
Columbus, OH 43201

of a permit to operate for:

K007 (Truck Prep Station #4)
Truck Prep Station #4

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part I: General Terms and Conditions

1 Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this

permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Truck prep station number 4	OAC rule 3745-31-05 PTI # 01-6762	Maximum hourly VOC emissions from K007 shall not exceed 5.75 pounds VOC per hour. Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month. Emissions of any single HAP and total HAPs from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month and 2.04 tons per month, respectively. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11 and 3745-21-09(U).
	OAC rule 3745-17-11(A)(4)	Allowable hourly particulate emissions shall not exceed 0.551 pound per hour.
	OAC rule 3745-21-09(U)(2)(e)(ii)	Exemption based on maximum coating(s) usage not to exceed 10 gallons each day. See B.1. below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

B. Operational Restrictions

- The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit.
- The permittee shall operate the dry filtration system whenever this emissions unit is in operation

C. Monitoring and/or Record Keeping Requirements

- The permittee shall collect and record the total volume, in gallons, of all the coatings employed each day.

C. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for the purpose of determining VOC, individual HAP, and total HAPs emissions for K002, K003, K004, K005, K006 and K007, combined:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner, and cleanup material employed.
 - b. The VOC content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - c. The total HAPs content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - d. The individual HAP content of each coating, thinner, and cleanup material employed, in pounds per gallon
 - e. The number of gallons of each coating, thinner, and cleanup material employed
The total VOC emissions from all coatings, thinners and cleanup materials employed, in tons.
 - g. The total HAPs emissions from all coatings, thinners, and cleanup materials employed, in tons
 - h. The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in tons.
3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification of each coating (including each sealer and each other primer), thinner and cleanup material employed.
 - b. The VOC content of each coating, thinner and cleanup material, in pounds per gallon
 - c. The number of gallons of each coating, thinner and cleanup material employed
 - d. The total VOC emissions from all coatings, thinners and cleanup materials employed, in pounds
 - e. The total number of hours this emissions unit was in operation
 - f. The average hourly VOC emissions rate, in pounds.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Director of Ohio EPA in writing of any exceedance of the restriction on the number of gallons of coatings applied per day in this emissions unit. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports to the Director of Ohio EPA that identify all exceedances of the hourly emission limitation for VOC and the monthly emission limitations for VOC, individual HAP, and combined HAPs. Each report shall be sent to the Central District Office within 45 days after the exceedance occurs.
3. The permittee shall notify the Director (the Central District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Central District Office) within 45 days after the event occurs.

D. Reporting Requirements (continued)

4. The permittee shall also submit annual reports to the Central District Office that specify the following information:
- a. The total VOC emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - b. The total HAPs emissions from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
 - c. The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in K002, K003, K004, K005, K006, and K007, combined, in tons for each month.
- These reports shall be submitted to the Central District Office by January 31 of each year and shall include information for each month during the previous calendar year (i.e., January through December).

E Testing Requirements

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):
- 1.a Emissions Limitation:
Maximum hourly VOC emissions shall not exceed 5.75 pounds VOC per hour.

Applicable Compliance Method:
Compliance with the hourly VOC emissions limitation shall be demonstrated by the record keeping in section C.3. Formulation data shall be used to determine the VOC contents of the thinners and cleanup materials. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
 - 1.b Emissions Limitation:
Maximum hourly particulate emissions shall not exceed 0.551 pound PE per hour.

Applicable Compliance Method:
Compliance with the particulate emission limitation may be demonstrated by using the following equation:
$$E \text{ (lbs/hr)} = \text{maximum coating application rate (gal/hr)} \times \text{coating solids content (lbs/gal)} \times (1-TE) \times (1-CE)$$
where,
E = particulate emission rate (lbs/hr)
TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for HVLP spray guns)
CE = control efficiency of the control equipment (95% for panel filter)

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.
 - 1.c Emissions Limitation:
Total VOC emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 4.23 tons VOC per month. Individual HAP and combined HAPs emissions from K002, K003, K004, K005, K006, and K007, combined, shall not exceed 0.83 ton per month and 2.04 tons per month, respectively.

Applicable Compliance Method:
Compliance with these emissions limitations shall be demonstrated by the record keeping in section C.2. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials.

E. Testing Requirements (continued)

- 1.d Emission Limitation:
Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the opacity limitation shall be determined in accordance to OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable:
A - F.