



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive  
Columbus, OH 43215-1099

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

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

Re: Permit to Install  
Summit County  
Application No: 16-1740  
TOXIC REVIEW  
SYNTHETIC MINOR

CERTIFIED MAIL

March 11, 1998

JSI COLLISION CENTERS  
MICHAEL GIARRIZZO  
65 BROADWAY  
BEDFORD, OH 44146

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. 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

Very truly yours,

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

cc: US EPA  
AKRON AIR POLLUTION CONTROL

George V. Voinovich, Governor  
Nancy P. Hollister, Lt. Governor  
Donald R. Schregardus, Director



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## Permit to Install Terms and Conditions

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Application No. 16-1740  
APS Premise No. 1677050168  
Permit Fee: \$800.00

Name of Facility: JSI COLLISION CENTERS

Person to Contact: MICHAEL GIARRIZZO

Address: 65 BROADWAY  
BEDFORD, OH 44146

Location of proposed source(s): 26 E STEELS CORNERS ROAD  
CUHAHOGA FALLS, OHIO

Description of proposed source(s):  
TWO HIGH-VOLUME LOW-PRESSURE PAINT SPRAY BOOTHS AND TWO HIGH  
-VOLUME LOW-PRESSURE PAINT PREP STATIONS.

Date of Issuance: March 11, 1998

Effective Date: March 11, 1998

REC'D. ARAU  
7 MAR 98 10: 51

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

*Donald R. Schreyer*

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Director

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**NOTICE OF INSPECTION**

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

**CONSTRUCTION OF NEW SOURCES**

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

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may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

#### PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

#### APPLICABILITY

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

#### BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

#### SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

AIR EMISSION SUMMARY

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001	Paint spray booth #1	*	3745-31-05 3745-17-07 3745-17-11 3745-21-09 3745-21-04 3745-21-10	0.551 lb/hr and 2.41 TPY particulates. Visible emissions from any stack shall not exceed 1% opacity, as a six-minute average. No visible emissions from building ventilation. **
K002	Paint spray booth #2	*	3745-31-05 3745-17-07 3745-17-11 3745-21-09 3745-21-04 3745-21-10	0.551 lb/hr and 2.41 TPY particulates. Visible emissions from any stack shall not exceed 1% opacity, as a six-minute average. No visible emissions from building ventilation. **
K003	Paint prep station #1	*	3745-31-05 3745-17-07 3745-17-11 3745-21-09 3745-21-04 3745-21-10	0.551 lb/hr and 2.41 TPY particulates. Visible emissions from any stack shall not exceed 1% opacity, as a six-minute average. No visible emissions from building ventilation. **

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K004	Paint prep station #2	*	3745-31-05 3745-17-07 3745-17-11 3745-21-09 3745-21-04 3745-21-10	0.551 lb/hr and 2.41 TPY particulates. Visible emissions from any stack shall not exceed 1% opacity, as a six-minute average. No visible emissions from building ventilation. **

\* FACILITY WIDE High-volume low-pressure paint gun application system and spray booth exhaust fabric filters for each spray booth and prep station. Federally enforceable facility-wide limitations of VOC emissions based on monthly facility-wide invoice records of materials employed. Compliance with Ohio EPA "Air Toxics Policy." See Additional Special Terms and Conditions.

\*\* 10.2 pounds/hour and 9.9 TPY VOC (facility-wide emissions).

**SUMMARY**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate Matter	9.6
VOC	9.9

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Akron Air Pollution Control, 146 South High St., Room 904, Akron, Ohio 44308.

**WASTE DISPOSAL**

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

**MAINTENANCE OF EQUIPMENT**

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

**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Akron Air Pollution Control, 146 South High St., Room 904, Akron, Ohio 44308.

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

**AIR POLLUTION NUISANCES PROHIBITED**

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

**CONSTRUCTION COMPLIANCE CERTIFICATION**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. Operations/Equipment Applicable Rules/Requirements and Emissions Limitations (also see Air Emissions Summary)**

The JSI automotive collision repair/painting facility in Cuyahoga Falls (OEPA facility identification number 1677050168) includes four high-volume low-pressure (HVLP), positive-pressure downdraft, paint spray booths (OEPA emissions unit Identification numbers K001, K002, K003, K004) each with a double-post fabric filtration system. The four spray booths are identical except Emissions Units K001 and K002, each with a bake oven (bake at 160 degrees Fahrenheit) are identified by the company as "paint spray booths" and Emissions Units K003 and K004, neither of which have a bake oven, are identified by the company as "paint prep stations". Cleanup is provided by a spray gun washer, which qualifies for permit exemption pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(w) covering solvent cold cleaners.

Emissions Units K001, K002, K003, K004 shall be regulated under OAC rules 3745-17-07 and 3745-17-11 covering emissions of particulates and OAC rule 3745-21-09(U) covering surface coating of miscellaneous metal parts. These emissions units shall be exempt from the limitation in OAC rule 3745-21-09(U)(1) pursuant to OAC rule 3745-21-09(U)(2)(c), but emissions of volatile organic compounds (VOC's), including emissions of hazardous air pollutants (HAP's), shall be limited pursuant to the best available technology (BAT) requirements for new sources covered under OAC rule 3745-31-05.

Based on application data, proposed maximum hourly facility-wide (all four emissions units combined) VOC emissions are 10.2 pounds/hour and proposed maximum yearly facility wide VOC emissions are 7.2 tons per year (TPY). Potential annual facility-wide VOC emissions are 44.8 TPY. Potential annual facility-wide emissions of individual and total-combined HAPs are above the respective Title V threshold levels of 10 TPY and 25 TPY.

The JSI Collision Center facility in Cuyahoga Falls does not want to be considered a major or Title V source (based on emissions of HAPs) and chooses to limit annual emissions of HAPs below Title V threshold levels by federally enforceable limitations of VOC emissions to 9.9 TPY, allowing the facility to operate as a "synthetic" minor source. The company reasons that if VOC emissions are limited to 9.9 TPY, then emissions of both individual and total-combined HAPs will likewise be limited to 9.9 TPY, excluding the facility from Title V status.

Based on applicable regulations and BAT, permit emission limitations are set as follows:

The maximum allowable hourly emission rate for particulates for each emissions unit is 0.551 pound/hour. Visible particulate emissions from any stack shall not

exceed 1 percent opacity, as a 6-minute average and there shall be no visible emissions from building ventilation (includes doors, windows, etc.). The maximum allowable hourly facility-wide emission rate of VOC is 10.2 pounds/hour. See Section A.2. and B below for additional emission limitations.

**2. Additional Terms and Conditions**

- a. Pursuant to the best available technology (BAT) requirements for new sources, as covered under OAC rule 3745-31-05, the permittee shall perform the following:
- i. installation and employment, for each emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), an HVLP paint gun application system to increase transfer efficiency of paint solids to the painted surface, thereby decreasing coating usage, and spray booth exhaust fabric filters to adequately control particulates;
  - ii. compliance with the OEPA "Air Toxics Policy", as described below in Section F; and,
  - iii. federally enforceable limitations of annual facility-wide emissions of VOC.

**B. Operational Restrictions**

1. The maximum annual VOC emissions from the facility shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation, following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of VOC (Tons)</u>
1	0.825
1-2	1.650
1-3	2.475
1-4	3.300
1-5	4.125
1-6	4.950
1-7	5.775
1-8	6.600
1-9	7.425
1-10	8.250
1-11	9.075
1-12	9.9

After the first 12 calendar months of operation, following the issuance of this permit, compliance with the annual facility-wide emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

2. The permittee shall monitor monthly facility-wide VOC emissions via monthly invoice records of all coating-components (i.e., resins, toners, reducers, hardeners, etc.), fillers, pre-paint prepping cleaners, and all other VOC-containing solvents/materials employed facility-wide (i.e., all above monthly invoiced-materials are consumed each month).

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

1. The permittee shall maintain the following monthly facility-wide (except where noted) records based on monthly facility-wide invoice records:
  - a. the name and identification number of each coating-component (See Section A.2.d.), filler, pre-paint cleaner, and any other VOC-containing solvent/material employed;
  - b. the VOC content of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed, in pounds of VOC per gallon of coating-component, filler, pre-paint cleaner, or any other VOC-containing solvent/material (manufacturer formulation data may be used, provided the VOC contents of all the above facility-invoiced materials have been determined, since January 1, 1991, in accordance with USEPA Method 24, 40 CFR Part 60, Appendix A, or similar approved test method);
  - c. the solids content of each solids-containing coating-component employed, in pounds of solids per gallon of coating-component (manufacturer formulation data may be used);
  - d. the number of gallons of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material;
  - e. the total VOC emissions contributed from all coating-components, fillers, pre-paint cleaners, and all other VOC-containing solvent/materials employed, in pounds/month. This value is calculated as follows: sum the multiplication products of the VOC content, in pounds/gallon, times the monthly

invoiced quantity, in gallons/month, for each and

every respective coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed;

- f. the total particulate emissions contributed from all solid-containing coating-components employed, in pounds/month. This value is calculated as follows: sum the multiplication products of the solids content, in pounds/gallon, times the monthly invoiced quantity, in gallons/month, for each and every solids-containing coating-component employed and multiply this sum by 0.25, which is the solids transfer loss factor (solids not deposited on coating surface) for an HVLP application method (from STAPPA ALAPCO, May 30, 1991). Multiply this result by 0.1, which is the assumed overall particulates loss factor (particulates not captured and controlled) for each of the emissions units;
- g. the total number of hours the facility was in operation;
- h. the hourly VOC emissions, in pounds/hour, calculated by dividing the value in e by the value in g above (i.e.,  $h=e/g$ );
- i. the average emissions unit hourly particulate emissions rate, in pounds/hour, calculated by dividing the value in f by the value in g above (i.e.,  $i=f/g$ ). This value is then divided by 4, resulting in the hourly particulate emissions rate, for each of the four emissions units;
- j. during the first 12 calendar months of operation, following the issuance of this permit, cumulative of monthly VOC emissions, in tons, for all calendar months back to the beginning of operations; and,
- k. after the first 12 calendar months of operation, following the issuance of this permit, summation of previous 12 calendar months of monthly VOC emissions, in TPY.

**D. Reporting Requirements**

1. The permittee shall submit required reports in the following manner:
  - a. reports of any required monitoring and/or recordkeeping information shall be submitted to Akron Air Pollution Control Agency; and,
  - 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 Akron Air Pollution Control 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.)

2. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly facility-wide VOC emissions rate exceeded the maximum allowable hourly facility-wide VOC emissions rate of 10.2 pounds/hour.
3. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly average emissions unit particulate emissions rate exceeded the maximum allowable hourly average emissions unit particulate emissions rate of 0.551 pound/hour.
4. The permittee shall submit deviation (excursion) reports identifying each calendar month of the first 12 calendar months of operation, after the issuance of this permit, during which the facility-wide cumulative of monthly VOC emissions exceeded the maximum allowable facility-wide cumulative of monthly emissions of VOC as listed in Section A.2.c. above.
5. The permittee shall submit deviation (excursion) reports identifying each rolling 12-month year, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide VOC emissions exceeded the maximum allowable annual facility-wide VOC emissions rate of 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.

**E. Testing Requirements**

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation

0.551 pound/hour particulate matter  
Applicable Compliance Method

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of Section C.1. of these Additional Special Terms and Conditions. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 5, 40 CFR Part 60, Appendix A.

b. Emission Limitation

10.2 pounds/hour VOC

Applicable Compliance Method

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of Section C.1. of these Additional Special Terms and Conditions. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 18, 40 CFR Part 60, Appendix A.

c. Emission Limitation

Visible particulate emissions from any stack shall not exceed 1 percent opacity, as a 6-minute average

Applicable Compliance Method

USEPA Method 9, 40 CFR Part 60, Appendix A.

d. Emission Limitation

No visible particulate emissions from building ventilation

Applicable Compliance Method

USEPA Method 22, 40 CFR 60, Appendix A.

e. Emission Limitation

Maximum allowable facility-wide cumulative of monthly VOC emissions, for the first 12 calendar months of operation following the issuance of this permit, as listed in Section A.2.c.

Applicable Compliance Method

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of Section C.1. of these Additional Special Terms and Conditions.

f. Emission Limitation

Maximum allowable facility-wide annual VOC emissions, after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of Section C.1. of these Additional Special Terms and Conditions.

F. **Miscellaneous Requirements**

1. This permit allows the use of the coating-components, fillers, pre-paint cleaners, and other VOC-containing solvents/materials specified by the permittee in the application for PTI number 16-1740. In conjunction with the BAT requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on both the coating-component, filler, pre-paint cleaner, and other VOC-containing solvent/material facility-wide usage rates and formulation data and the design parameters of the emissions units' exhaust systems, as specified in the application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for facility-wide emissions of toluene based on the Screen3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for toluene:

**Pollutant: toluene (CAS 108-88-3)**

**TWA (ug/m<sup>3</sup>): 188,000**

**Maximum Hourly Emission Rate (pound/hour): 10.2**

**Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2490**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4480**

2. Any of the following changes may be deemed a "modification" to the emissions unit(s), and as such, prior notification to and approval from the Akron Air Pollution Control Agency is required, including the

possible issuance of modifications to PTI number 16-1740 and the operating permit:

- a. any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or the use of new coating-components, filler, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold limit value, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;
- b. any change to the emissions unit(s) or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit(s) or its method of operation that would either require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
- d. any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
- e. any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in an increase in emissions of any HAPs, as defined in OAC 3745-77-01(V). A current listing of HAPs can be obtained from the Akron Regional Air Quality Management District (ARAQMD).