Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

10/2/2015

Certified Mail

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

David Mendoza
Service King Paint & Body, LLC
2600 N. Central Expressway #400
Richardson, TX 75080

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

Facility ID: 1677050168
Permit Number: P0118864
Permit Type: Renewal
County: Summit

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5*Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description: Service King Paint & Body LLC operates four existing paint spray booths (K001, K002, K003 and K004) in Summit County. Service King Paint & Body LLC desires to limit the facility's hazardous air pollutant (HAP) emissions to less than the Title V thresholds.

3. Facility Emissions and Attainment Status: This facility emits volatile organic compound (VOC) and HAPs from emissions units K001, K002, K003 and K004. While, the facility's potential to emit for VOC is less than the Title V thresholds (44.7 tons), both individual and combined HAP emissions are above the 10 tons per year and 25 tons per year threshold, respectively. Summit County is nonattainment for ozone.

4. Source Emissions: Combined emissions from emissions units K001, K002, K003 and K004 are 10.2 pounds of VOC per hour. Service King Paint & Body LLC will limit combined annual emissions of VOC to 9.9 tons per year, and thus restrict HAP emissions to less than the Title V thresholds.

5. Conclusion: The terms and conditions in the permit will limit the facility's individual and combined HAPs emissions to less than the Title V thresholds. The annual allowable VOC emission limitation will be 9.9 tons per year. Service King Paint & Body LLC shall maintain records summarizing the facility's emissions. Excursion reports will be required of the facility to ensure compliance.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	9.9

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Renewal
Service King Paint & Body, LLC
26 E Steels Corner Rd,, Cuyahoga Falls, OH 44223
ID#:P0118864
Date of Action: 10/2/2015
Permit Desc:FEPIO Renewal permit for four (4) automotive paint spray booths (K001 - K004)..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Laura Miracle, Akron Regional Air Quality Management District, 1867 West Market St., Akron, OH 44313. Ph: (330)375-2480

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Service King Paint & Body, LLC

Facility ID:	1677050168
Permit Number:	P0118864
Permit Type:	Renewal
Issued:	10/2/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Service King Paint & Body, LLC

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Authorization

Facility ID:	1677050168
Application Number(s):	A0053336
Permit Number:	P0118864
Permit Description:	FEPIO Renewal permit for four (4) automotive paint spray booths (K001 - K004).
Permit Type:	Renewal
Permit Fee:	$0.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/2/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Service King Paint & Body, LLC
26 E Steels Corner Rd
Cuyahoga Falls, OH 44223

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

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

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0118864
Permit Description: FEPIO Renewal permit for four (4) automotive paint spray booths (K001 - K004).

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

Group Name: Automotive Paint Spray Booths

Emissions Unit ID:	**K001**
Company Equipment ID:	Spray Booth 1
Superseded Permit Number:	P0105290
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Spray Booth 2
Superseded Permit Number:	P0105290
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Prep Station 3
Superseded Permit Number:	P0105290
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Prep Station 4
Superseded Permit Number:	P0105290
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

2. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart HHHHHH, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Automotive Paint Spray Booths: K001,K002,K003,K004,

EU ID	Operations, Property and/or Equipment Description
K001	Spray Booth 1
K002	Spray Booth 2
K003	Spray Booth 3
K004	Spray Booth 4

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(7), d)(8), d)(9), d)(10) and e)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., d)(1), e)(1) and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 16-1740)	Volatile organic compound (VOC) emissions shall not exceed 10.2 pounds per hour (combined emissions from emissions units K001, K002, K003 and K004).
b.	OAC rule 3745-31-05(D)	Combined annual emissions from the entire facility (emissions units K001, K002, K003 and K004) shall not exceed 9.9 tons of VOC per year, based upon a rolling, 12-month summation of the monthly emissions.
c.	OAC rule 3745-17-11(A)(1)(i)	Surface coating processes that use less than five gallons of coatings per day, provided the permittee maintains coating usage records, coating purchase records, and/or production records that clearly

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		demonstrate the actual coating usage is less than five gallons per day are exempt from the requirements of OAC rule 3745-17-11(C).
d.	OAC rule 3745-21-09(U)(1)	None, pursuant to OAC rule 3745-21-09(U)(2)(c). See c)(1) below.
e.	OAC rule 3745-21-18(C)	The permittee shall not apply coatings that contain volatile organic compounds (VOCs) in excess of the following: 6.5 pounds VOC per gallon of coating, excluding water and exempt solvents (for pretreatment primer) 4.8 pounds VOC per gallon of coating, excluding water and exempt solvents (for primer-surfacer) 4.6 pounds VOC per gallon of coating, excluding water and exempt solvents (for primer-sealer) 5.0 pounds VOC per gallon of coating, excluding water and exempt solvents [for topcoat (single-stage) and topcoat (two-stage basecoat/clearcoat)] 5.2 pounds VOC per gallon of coating, excluding water and exempt solvents [for topcoat (three or four-stage basecoat/clearcoat)] 5.7 pounds VOC per gallon of coating, excluding water and exempt solvents (for multi-colored topcoat) 7.0 pounds VOC per gallon of coating, excluding water and exempt solvents (for automotive specialty)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The emissions units listed above shall only be operated to repaint (refinish) used motor vehicles and trailers.

(2) The permittee shall only use one or more of the following application techniques to apply any coating containing a VOC in the emissions units listed above:

a. Flow or curtain coating;

b. Dip coating;

c. Roller coating;

d. Brush coating;

e. Cotton-tipped swab application;

f. Electro-deposition coating;

g. HVLP spraying;

h. Electrostatic spray;

i. Airless spray;

j. Air-assisted airless spray; and

k. Any other coating application method that the owner or operator of the facility demonstrates and Ohio environmental protection agency determines achieves emission reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio environmental protection agency. Any equivalent coating application method approved by the director shall be submitted to the USEPA as a revision to the Ohio state implementation plan for ozone.

(3) The permittee shall ensure that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, in accordance with the manufacturer's specifications, and in the handling of a coating and any solvents used to clean the sprayer.

(4) The permittee shall ensure that that the spray guns used to apply mobile equipment repair and refinishing coatings shall be cleaned by one of the following:

a. An enclosed spray gun cleaning system that is kept closed when not in use;

b. Un-atomized discharge of solvent into a paint waste container that is kept closed when not in use;

c. Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; and

d. Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

(5) The permittee shall store the following materials in nonabsorbent, non-leaking containers and keep these containers closed at all times when not in use:

a. Fresh coatings;

b. Used coatings;

c. Solvents;

d. VOC-containing additives and materials;

e. VOC-containing waste materials; and

f. Cloth, paper, or absorbent applicators moistened with any of the items listed in this subsection.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall 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 , 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 number of gallons of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material;

d. the total VOC emissions contributed from all coating-components, fillers, pre-paint cleaners, and all other VOC-containing solvents/materials employed, in pounds per month (this value is calculated as follows: sum the multiplication products of the VOC content, in pounds per gallon of coating, times the monthly invoiced quantity, in gallons per month, of each and every respective coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed);

e. the total number of hours the facility was in operation;

f. the average hourly VOC emissions, in pounds per hour, calculated by dividing the value in d)(1)d. by the value in d)(1)e. above (i.e., f = d/e); and

g. the rolling, 12-month summation of VOC emissions, in tons per year.

(2) The permittee shall calculate the VOC content of the coatings employed in accordance with the following:

a. Except for multi-stage topcoats, the mass of VOC per combined volume of VOC and coating solids, excluding water and exempt solvents, shall be calculated by the following equation:

$$VOC = \frac{(W_v - W_w - W_{ec})}{(V - V_w - V_{ec})}$$

where:

VOC = VOC content in pounds per gallon of coating, excluding water and exempt solvents;

W_v = mass of total volatiles, in pounds;

W_w = mass of water, in pounds;

W_{ec} = mass of exempt solvents, in pounds;

V = volume of coating, in gallons;

V_w = volume of water, in gallons; and

V_{ec} = volume of exempt solvents, in gallons.

b. The VOC content of a multi-stage topcoat shall be calculated by the following equation:

$$VOC_{multi} = \frac{VOC_{bc} + \sum_{i=0}^{M} VOC_{mci} + 2(VOC_{cc})}{M + 3}$$

where:

VOC_{multi} = VOC content of multistage topcoat, in pounds per gallon, excluding water and exempt solvents;

VOC_{bc} = VOC content of basecoat, in pounds per gallon, excluding water and exempt solvents;

VOC_{mci} = VOC content of each midcoat(s), in pounds per gallon, excluding water and exempt solvents;

VOC_{cc} = VOC content of the clear coat, in pounds per gallon, excluding water and exempt solvents; and

M = number of midcoats.

(The VOC content of each coating shall be measured in accordance with USEPA method 24.)

(3) The permittee shall maintain records for a period of five years of the amount and VOC content of each coating employed.

(4) The permittee shall retain documentation on site sufficient to demonstrate that high efficiency transfer application techniques of coatings are in use and to verify that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the sprayer. The permittee shall make the documentation available to the appropriate Ohio environmental protection agency district office or local air agency upon request.

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(6) The permittee maintains coating usage records, coating purchase records, and/or production records that clearly demonstrate the actual coating usage is less than five gallons per day for each emissions unit listed above.

(7) The application for Permit to Install (PTI) 16-1740 for emissions units K001, K002, K003 and K004 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents

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

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 10.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2490

MAGLC (ug/m3): 4480

The permittee, has demonstrated that emissions of toluene, from emissions units K001, K002, K003 and K004 is calculated to be less than eighty per cent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(8) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final Federally Enforceable Permit to Install and Operate (FEPTIO) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(10) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month emission limitation for VOC.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(2) The permittee shall submit the following information by April 2, 2010 for the emissions units listed above:

a. documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings are in use; and

b. documentation to verify that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the sprayer.

(3) The permittee shall submit a written report to the Director (the appropriate District Office or local air agency) that includes all exceedances of the VOC content of each coating employed in the emissions units listed above. The report shall be in submitted to the Director (the appropriate District Office or local air agency) within forty-five days after each exceedance is discovered.

(4) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

(5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(6) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 10.2 pounds per hour (combined emissions from emissions units K001, K002, K003 and K004).

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above based on the results of emission testing conducted in accordance with Method 1-4, 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

Combined annual emissions from the entire facility (emissions units K001, K002, K003 and K004) shall not exceed 9.9 tons of VOC per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above.

c. Emission Limitations:

The permittee shall not apply coatings that contain volatile organic compounds (VOCs) in excess of the following:

6.5 pounds VOC per gallon of coating, excluding water and exempt solvents (for pretreatment primer)

4.8 pounds VOC per gallon of coating, excluding water and exempt solvents (for primer-surfacer)

4.6 pounds VOC per gallon of coating, excluding water and exempt solvents (for primer-sealer)

5.0 pounds VOC per gallon of coating, excluding water and exempt solvents [for topcoat (single-stage) and topcoat (two-stage basecoat/clearcoat)]

5.2 pounds VOC per gallon of coating, excluding water and exempt solvents [for topcoat (three or four-stage basecoat/clearcoat)]

5.7 pounds VOC per gallon of coating, excluding water and exempt solvents (for multi-colored topcoat)

7.0 pounds VOC per gallon of coating, excluding water and exempt solvents (for automotive specialty)

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) and d)(3) above.

g) Miscellaneous Requirements

(1) None.