State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
WARREN COUNTY

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05192

DATE: 8/16/2001

Automotive Resources, Inc.
Robert Penenburgh
9990 Lee Highway Suite 160
Fairfax, VA 220301720

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 within thirty (30) days after the notice of the Directors 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

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

CC: **USEPA** **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 8/16/2001**
Terms and Conditions	**Effective Date: 8/16/2001**

FINAL PERMIT TO INSTALL 14-05192

Application Number:	14-05192
APS Premise Number:	1483060429
Permit Fee:	**$200**
Name of Facility:	Automotive Resources, Inc.
Person to Contact:	Robert Penenburgh
Address:	9990 Lee Highway Suite 160 Fairfax, VA 220301720

Location of proposed air contaminant source(s) [emissions unit(s)]:
4119 Binion Way
Lebanon, **Ohio**

Description of proposed emissions unit(s):
Installation of new miscellaneous metal parts paint spray booth.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. 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.)

3. 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 this permit. Such records may be maintained in computerized form.

4. 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 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.

5. 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 units 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 the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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) 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 the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. 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.

13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	1.92

Emissions Unit ID: **K001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - JBI CIDB-1410-S miscellaneous metal parts paint spray booth with HVLP gun	OAC rule 3745-31-05(A)(3)	22.9 lbs VOC/day including emissions from cleanup materials; 1.92 TPY VOC including emissions from cleanup materials. See T&Cs A.2.b., A.2.c. and B.2. through B.4. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).
	OAC rule 3745-21-09(U)(2)(e)(ii)	See T&C B.1.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of High Volume Low Pressure (HVLP) coating applicators, compliance with the daily and annual VOC emissions limitations and compliance with the VOC content and usage limitations.

2.b The Volatile Organic Compound (VOC) content of any surface coating employed in emissions unit K001 shall not exceed 5.22 pounds VOC per gallon of coating, as applied.

2.c The Volatile Organic Compound (VOC) content of any cleanup material employed in emissions unit K001 shall not exceed 7.25 pounds VOC per gallon of cleanup material, as applied.

B. Operational Restrictions

1. The maximum daily surface coating usage for emissions unit K001 shall not exceed 3 gallons.

2. The maximum daily cleanup material usage for emissions unit K001 shall not exceed 1 gallon.

3. The maximum annual surface coating usage for emissions unit K001 shall not exceed 600 gallons.

4. The maximum annual cleanup material usage for emissions unit K001 shall not exceed 96 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K001:

   a. The name and identification number of each coating and cleanup material employed;

   b. The volume, in gallons, of each coating employed;

   c. The total volume, in gallons, of all of the coatings employed;

   d. The volume, in gallons, of each cleanup material employed;

   e. The total volume, in gallons, of all cleanup materials employed;

   f. The VOC content of each coating employed, in pounds of VOC per gallon of coating, as applied;

   g. The VOC content of each cleanup material employed, in pounds of VOC per gallon of cleanup material, as applied; and

   h. The total VOC emission rate for all coatings and cleanup materials employed, in pounds per day [the sum of (b x f) + (d x g) for each coating and cleanup material employed].

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit and/or the applicable daily cleanup material usage limit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of

Environmental Services within 45 days after the exceedance occurs.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of noncomplying coatings and/or cleanup materials (i.e., for VOC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days following the end of the calendar month.

3. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which summarize the following for emissions unit K001:

   a. The total VOC emissions from coatings and cleanup materials employed in this emissions unit for the previous calendar year.

   b. The total number of gallons of coatings employed in this emissions unit for the previous calendar year.

   c. The total number of gallons of cleanup materials employed in this emissions unit for the previous calendar year.

   The reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the VOC emission limitations established in this permit shall be based upon the recordkeeping requirements as specified in T&C C.1.

2. Compliance with the coating and cleanup material usage limitations shall be demonstrated by the recordkeeping requirements as specified in T&C C.1.

3. USEPA methods 24 and/or 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05192 Facility ID: 1483060429

FACILITY NAME Automotive Resources, Inc.

FACILITY DESCRIPTION Installation of new miscellaneous metal parts paint spray booth. CITY/TWP Lebanon

SIC CODE 3534 SCC CODE 4-02-025-01 4-02-025-02 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION JBI CIDB-1410-S miscellaneous metal parts paint spray booth with HVLP gun

DATE INSTALLED Upon PTI Issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	Attainment	14.1 lbs./day	1.21	22.9 lbs./day	1.92
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of High Volume Low Pressure (HVLP) coating applicators, compliance with the daily and annual VOC emissions limitations and compliance with the VOC content and usage limitations.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $0

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: None; Air Toxics < 1 TPY each

NEW SOURCE REVIEW FORM B

PTI Number: 14-05192 Facility ID: 1483060429

FACILITY NAME Automotive Resources, Inc.

FACILITY DESCRIPTION Installation of new miscellaneous metal parts paint spray booth. CITY/TWP Lebanon

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☐	0000000**c**.wpd	☒	
Modeling form/results	☐	0000000**s**.wpd	☐	☒
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☒
BAT Study	☐	0000000**b.**wpd	☐	☒
Other/misc.	☐	0000000**t**.wpd	☐	☒

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

PTI 14-05192

Automotive Resources, Inc. (ARI Metal Products)
4119 Binion Way
Lebanon, Ohio 45036

Ohio EPA Premise # 1483060429

This permit allows ARI Metal Products to install a Miscellaneous Metal Parts Paint Spray Booth with HVLP coating applicator (spray gun). ARI will fabricate heavy-duty automotive lifts at this new facility. ARI has applied to use non-compliant coatings in excess of the VOC content limits for miscellaneous metal parts coating in OAC rule 3745-21-09(U)(1).

In lieu of compliance with the VOC content limits, the permittee has agreed to comply with OAC rule 3745-21-09(U)(2)(e)(ii) which states that, for Warren County, the requirements of 21-09(U)(1) shall not apply to any miscellaneous metal parts coating operation which never use more than three (3) gallons per day. Thus, BAT will limit the daily coating use to 3 gallons per day and the VOC content to 5.22 lbs VOC per gallon.

BAT statement: Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of High Volume Low Pressure (HVLP) coating applicators, compliance with the daily and annual VOC emissions limits and compliance with the VOC content and usage limitations.

Actual Emissions/Allowable Emissions: 14.1 lbs VOC/day, 1.21 TPY VOC, including emissions from cleanup materials.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05192 Facility ID: 1483060429

FACILITY NAME Automotive Resources, Inc.

FACILITY DESCRIPTION	Installation of new miscellaneous metal parts paint spray booth.	CITY/TWP	Lebanon

Allowable Emissions: 22.9 lbs VOC/day, 1.92 TPY VOC, including emissions from cleanup materials.

Since the Maximum Potential to Emit of VOC and HAPs emissions are less than the respective Major Source thresholds, no Synthetic Minor requirements are needed for this permit. ARI is classified as a minor source. Emissions unit K001 will emit Air Toxics (as defined by the Ohio EPA Air Toxics Policy) at less than 1 TPY each. The Ohio EPA Air Toxics Policy applies on in the instance that ARI would modify K001 such that any Air Toxic exceeds 1 TPY and further Air Toxic modeling would be necessary.

Recommend Direct Final issuance of this permit.

Permit Fee: PWR (0-1000 lbs/hr) = $200

Prepared by: Kurt Smith
Date prepared: August 1, 2001

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☐ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

13358.wpd

NEW SC
PTI Num
FACILIT

Emissions Unit ID: **K001**

FACILITY DESCRIPTION Installation of new miscellaneous metal parts paint spray booth.

CITY/TWP Lebanon

Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:
NONE

Please complete:

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	1.92