Ohio Environmental Protection Agency

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

Certified Mail

1/11/2016

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

Mr. Angelo Papotto
Suburban Collision
26618 Brookpark Road
North Olmsted, OH 44070

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318378707
Permit Number: P0119213
Permit Type: Initial Installation
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: CDAQ

Ohio Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Suburban Collision

Facility ID:	1318378707
Permit Number:	P0119213
Permit Type:	Initial Installation
Issued:	1/11/2016
Effective:	1/11/2016
Expiration:	1/11/2026

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Suburban Collision

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Authorization

Facility ID:	1318378707
Application Number(s):	A0053846
Permit Number:	P0119213
Permit Description:	Initial PTIO for emissions unit K001, an already-installed spray booth employing a dry filter for the control of over-spray.
Permit Type:	Initial Installation
Permit Fee:	$400.00
Issue Date:	1/11/2016
Effective Date:	1/11/2016
Expiration Date:	1/11/2026

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Suburban Collision
4960 Dover Center Rd
North Olmsted, OH 44070

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:

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

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: P0119213
Permit Description: Initial PTIO for emissions unit K001, an already-installed spray booth employing a dry filter for the control of over-spray.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	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 [DO/LAA] 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 Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart HHHHHH, The National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA, Region 5. The complete requirements of this rule (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 Cleveland Division of Air Quality (Cleveland DAQ).

C. Emissions Unit Terms and Conditions

1. K001, Spray Booth

Operations, Property and/or Equipment Description:

Enclosed Garmat (Chinook 2 99275C) Spray Booth with gas-fired bake oven (rated at 1.2 mmBTU/hr), utilizing a spray gun for manually coating auto body parts.

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

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

a. b)(1)b., b(1)e, b)(2)b., d)(3)-(6), 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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Volatile organic compound (VOC) emissions shall not exceed 0.58 ton per month averaged over a twelve-month rolling period from coatings and clean-up materials.Seeb(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year (TPY), taking into account the federally enforceable rule limits under OAC rule 3745-21-18. See b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(C)	Exempt. See b)(2)c. below.
d.	OAC rule 3745-21-09(U)	Exempt per OAC Rule 3745-21-09(U)(2)(c).
e.	OAC rule 3745-21-18	See b)(2)d., c)(1)-(5), d)(1), and e)(3)-(4) below.
f.	OAC rule 3745-114 ORC 3704.03(F)	See d)(3)-(6) and e)(5) below.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) as part of the Ohio SIP.

c. This rule is not applicable pursuant to OAC rule 3745-17-11(A)(i), surface coating processes that use less than five gallons of coatings per day. The owner or operator shall maintain records that clearly demonstrate the actual coating usage is less than five gallons per day.

d. The permittee shall not apply to mobile equipment or mobile equipment components any automotive pretreatment, automotive primer-surfacer, automotive primer-sealer, automotive topcoat, or automotive specialty coatings, including any VOC-containing materials added to the original coating supplied by the manufacturer, that contain VOCs in excess of the limits specified in the following table:

Coating Type	Limit (pounds VOC per gallon of coating, excluding water and exempt solvents)	Limit (grams VOC per liter of coating, excluding water and exempt solvents)
pretreatment primer	6.5	780
primer-surfacer	4.8	575
primer-sealer	4.6	550

Coating Type	Limit (pounds VOC per gallon of coating, excluding water and exempt solvents)	Limit (grams VOC per liter of coating, excluding water and exempt solvents)
topcoat (single-stage)	5.0	600
topcoat (two-stage basecoat/clearcoat)	5.0	600
topcoat (three or four-stage basecoat/clearcoat)	5.2	625
multi-colored topcoat	5.7	680
automotive specialty	7.0	840

c) Operational Restrictions

(1) The permittee shall use less than five gallons of coatings per day.

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

a. flow or curtain coating;

b. dip coating;

c. roller coating;

d. brush coating;

e. cotton-tipped swab application;

f. electro-deposition coating;

g. HVLP spraying;

h. electrostatic spray;

i. airless spray;

j. air-assisted airless spray; or

k. any other coating application method that the owner or operator of the facility demonstrates and the Ohio EPA determines achieves emission reductions equivalent to HVLP or electrostatic spray application methods. This

demonstration shall be submitted for approval to the director. Any equivalent coating application method approved by the director shall be submitted to the U.S. EPA as a revision to the Ohio SIP for ozone.

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

(4) The permittee shall ensure that the spray guns used to apply mobile equipment repair and refinishing coatings are 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 above.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating and clean-up material employed;

b. the identification of the coating type (as referenced) in b.(2)d. for each coating employed;

c. the amount, in gallons, of each coating and clean-up material employed;

d. the VOC content of each coating and clean-up material, in pounds per gallon, as applied;

e. the total VOC emissions from all coatings and clean-up materials employed, in pounds (summation of [d)(1)c. x d)(1)d.] for each coating and clean-up material); and

f. the average monthly VOC emissions over a 12-month period, i.e., the total VOC emissions for the present month plus the previous 11 months, in tons, divided by 12 months.

(2) The permittee shall maintain coating usage records, coating purchase, records, and/or production records that clearly demonstrate the actual coating usage is less than five gallons per day.

(3) The permittee shall submit documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings are in use at the facility and that all employees applying coatings are properly trained in the use of the HVLP sprayer, or equivalent application, and in the handling of coatings and any solvents used to clean the spray equipment. The permittee shall maintain a copy of this documentation on-site and shall make this documentation available to the Ohio EPA, or its representative, upon request.

(4) The PTIO application for this emissions unit, K001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit 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 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 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, (as determined from the coatings applied) has been documented from one of the following sources and in the following order of preference (threshold limit value (TLV) was and shall be used, if the chemical is listed):

i. 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, i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 hours per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 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 TPY) or "worst case" toxic contaminant:

i. Toxic Contaminant: toluene

TLV (mg/m^3): 75.4 mg/m^3

Maximum Hourly Emission Rate (lb/hr): 0.86 lb/hr

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 83.19 $\mu g/m^3$

MAGLC ($\mu g/m^3$): 1,795.2 $\mu g/m^3$

ii. Toxic Contaminant: xylene

TLV (mg/m^3): 434.2 mg/m^3

Maximum Hourly Emission Rate (lb/hr): 1.19 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 115 $\mu g/m^3$

MAGLC ($\mu g/m^3$): 10,338.1 $\mu g/m^3$

The permittee has demonstrated that emissions of toluene and xylene, from emissions unit K001, are calculated to be less than eighty per cent of the MACLG; 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).

(5) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used I 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 TLV than the lowest TLV previously modeled;

b. changes I 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 and its 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 PTIO 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.

(6) 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 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 or the materials applied.

(7) 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 reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as hard copy to the Cleveland DAQ.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ 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.

(3) The permittee shall submit documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings required by OAC rule 3745-21-18 are in use at the facility. The documentation also shall 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. This documentation shall be submitted to the Cleveland DAQ no later than April 2, 2010.

The owner or operator shall retain the documentation on site and make the documentation available to the Cleveland DAQ upon request.

(4) The permittee shall report to the director all emissions in excess of the limits specified in b)(2)d. above (Table 1 of OAC rule 3745-21-18), within forty-five days after each exceedance is discovered.

(5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the emission limitations specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitation:</u>

Volatile organic compound (VOC) emissions shall not exceed 0.58 ton per month averaged over a twelve-month rolling period from coatings and clean-up materials.

Applicable Compliance Method:

Compliance with the monthly average VOC emissions limitation over a 12-month rolling period shall be determined by the recordkeeping in d)(1).

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

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 = (Wv - Ww - Wec) / (V – Vw – Vec)

where:

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

Wv = mass of total volatiles, in pounds;

Ww = mass of water, in pounds;

Wec = mass of exempt solvents, in pounds;

V = volume of coating, in gallons;

Vw = volume of water, in gallons; and

Vec = volume of exempt solvents, in gallons.

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

$$VOCmulti = \frac{VOCbc + \sum_{i=0}^{M} VOCmci + 2(VOCcc)}{M+3}$$

where:

VOCmulti = VOC content of multistage topcoat, in pounds per gallon, excluding water and exempt solvents;

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

VOCmci = VOC content of each midcoat, in pound per gallon, excluding water and exempt solvents;

VOCcc = 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) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 or Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the clean-up materials.

g) Miscellaneous Requirements

(1) OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that an increase in the amount of coating sprayed to five gallons or more in one day may require the permittee to apply for and obtain a new PTIO. In the event that the amount of coating sprayed in one day amounts to five gallons or more, the permittee shall contact the Cleveland DAQ.

(2) This emissions unit was installed on June 1, 2012.