

Facility ID: 1652050183 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050183 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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) None.
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.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
auto body repair spray paint shop - repainting (refinishing) of used motor vehicles	OAC rule 3745-31-05(A)(3) (PTI 16-02329)	400 pounds/week & 10.4 tons/year of organic compounds (OCs)

There shall be no visible emissions of particulate matter (from sand blasting, spray painting, or any other activity associated with this emissions unit) emitted to the ambient air.

The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(c).

OAC rule 3745-21-09(U)(2)(c) compliance coating exemption [See B.1 below.]

2. Additional Terms and Conditions

- (a) The above weekly and yearly OC emissions limits (regulated per OAC rule 3745-31-05(A)(3)) are based on the potential to emit for this emissions unit, as determined from permit application data. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emissions limits.

However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

The permittee shall install, or have installed, exhaust fan filters to effectively control paint overspray and sandblasting dust emissions, and a vertical stack of sufficient height to effectively disperse paint fumes from this emissions unit.

B. Operational Restrictions

1. The permittee shall be restricted to repainting (refinishing) used motor vehicles and trailers. No other items shall be allowed to be coated in this emissions unit.
2. All sand blasting, spray painting, and any other activity associated with this emissions unit shall be conducted inside a properly contained building with all doors and windows closed during operation.
3. All coating, filler, primer, sealer, purging, cleaner, and fresh and waste solvent containers shall be tightly sealed when not in use. All rags, brushes, and any other articles containing organic compound materials shall be held in a tightly sealed container when not in use or for proper disposal.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall document all days of coating items other than allowed in this emissions unit.
2. The permittee shall document all days sandblasting, spray painting, or any other activity associated with this emissions unit was performed outside the building containing this emissions unit.
3. The permit to install for K001 was evaluated based on the actual materials used or processed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was

applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-butyl acetate CAS 123-86-4
 TLV (ug/m3): 713,000
 Maximum Average Hourly Emission Rate (lbs/hr): 8.5
 Predicted 1-Hour Maximum Ground-Level Concentration at 192 m (ug/m3): 402
 MAGLC (ug/m3): 16,976

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxics Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the coating of items other than allowed in this emissions unit. The notification shall include a copy of such record and shall be submitted within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing sandblasting, spray painting, or any other activity associated with this emissions unit was performed outside the building containing this emissions unit. The notification shall include a copy of such record and shall be submitted within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 Emission Limitations: 400 pounds/week & 10.4 tons/year of OCs
 Applicable Compliance Method: The OC emissions limitations are based upon the emission unit's potential to emit:

$$W = TVt + CVc + PVp + SVs + BVb + LVI; \text{ and}$$

$$Y = (W)(52 \text{ weeks/year})(1 \text{ ton}/2000 \text{ pounds}).$$

Where:

W = 400 pounds/week of OCs [weekly potential to emit];
 Y = 10.4 tons/year of OCs [yearly potential to emit];
 T = 4.9 pounds of OCs/gallon of topcoat [maximum OC content];
 Vt = 40.8 gallons of topcoat/week [maximum weekly usage];
 C = 4.7 pounds of OCs/gallon of clearcoat [maximum OC content];
 Vc = 10.2 gallons of clearcoat/week [maximum weekly usage];
 P = 6.0 pounds of OCs/gallon of pretreatment wash primer [maximum OC content];
 Vp = 2.3 gallons of pretreatment wash primer/week [maximum weekly usage];
 S = 4.8 pounds of OCs/gallon of primer surfacer [maximum OC content];
 Vs = 3.4 gallons of primer surfacer/week [maximum weekly usage];
 B = 4.6 pounds of OCs/gallon of prime sealer [maximum OC content];
 Vb = 11.3 gallons of prime sealer/week [maximum weekly usage];
 L = 7 pounds of OCs/gallon of lacquer thinner [density]; and
 Vl = 11.5 gallons of lacquer thinner/week [maximum weekly usage].
 Emission Limitation: no visible emissions of particulate matter to the ambient air

Applicable Compliance Method: If necessary, compliance demonstration shall be based upon visible emissions

of particulate matter observations conducted on any stack and the general ventilation (i.e., doors, windows, etc.) of the building containing sand blasting, spray painting, and any other activity associated with this emissions unit.

F. **Miscellaneous Requirements**

1. None