

Facility ID: 1677000251 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: 1677000251 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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**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>
coating line - auto body repair facility - repainting (refinishing) of used motor vehicles, employing a high volume, low pressure (HVLP) paint application method with bake oven (operating between 55 to 160 degrees Fahrenheit)	OAC rule 3745-31-05 (PTI 16-1953)	6.1 lbs/hr of OC and 26.9 tpy of OC;  1.0 lb/hr of any individual HAP and 4.4 tpy of any individual HAP; and  3.5 lbs/hr of any HAP combination and 15.3 tpy of any HAP combination.
[Note: Potential organic compound (OC) and hazardous air pollutant (HAP) emissions are greatest when employing clear coat, because of: (1) relatively high OC and HAP contents; and (2) significantly higher coating application rate capacity compared to any other coating at the facility]	OAC rule 3745-21-09(U)(1)	See A.2, B.3, B.4, C.2, C.3 and C.4 below for other OAC rule 3745-31-05 requirements.  Exempt pursuant to OAC rule 3745-21-09(U)(2)(d). See B.1, B.2 and B.5 below.

**2. Additional Terms and Conditions**

- (a) All of the above emission limits (regulated under OAC rule 3745-31-05) are based on the potentials to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, nor emissions calculations are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with paint 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 this permit to install or a new final permit to install prior to making the change(s).  
The permittee shall properly operate and maintain a HVLP paint application system for this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals.

**B. Operational Restrictions**

1. The permittee shall limit the number of motor vehicles coated to less than 35 per day when applying a customized topcoat and any related customized single coat to motor vehicles.
2. The permittee shall be restricted to the repainting (refinishing) of used motor vehicles and trailers.
3. The permittee shall properly operate and maintain the spray booth exhaust fan panel filter elements while this emissions unit is in operation.
4. The permittee shall be restricted to only natural gas as fuel for the bake oven.
5. No primer coatings shall be employed in this emission unit.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the number of motor vehicles coated each day for the line.
2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic 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 Toxic 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 Toxic Policy" for the change.
3. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) 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 Toxic 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: toluene (CAS 108-88-3)

TLV (ug/m3): 188,000

Maximum Average Hourly Emission Rate (lbs/hr): 6.1

Predicted 1-Hour Maximum Ground-Level Concentration at 16 m (ug/m3): 1593

MAGLC (ug/m3): 4476

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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic 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;
  - 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.); and
  - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed LTV.

If the permittee determines that the "Air Toxic 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.

#### D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify any exceedances of the daily production rate limitation of less than 35 motor vehicles per day, as well as the corrective actions that were taken to achieve compliance. The reports shall be submitted to the appropriate Ohio EPA District Office or local air agency 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.) If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

#### 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 (all emissions based on clear coat product #7600S and Economy lacquer thinner cleanup material with toluene being the highest emitted HAP common to both):  
Emission Limitations: 6.1 lbs/hr of OC and 26.9 tpy of OC

Applicable Compliance Method: The OC emission limitations reflect the emissions unit's potentials to emit and were established based upon the following information:

$PTE[OC]_h = (CARC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$ ; and

$PTE[OC]_y = (PTE[OC]_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds})$ .

Where:

\* $PTE[OC]_h = 6.1$  pounds of OC/hour [hourly potential to emit OC];

\* $PTE[OC]_y = 26.9$  tons of OC/year [yearly potential to emit OC];

\* $CARC_{max} = 0.81$  gallon of coating/hour [maximum coating application rate capacity];

\* $OCC_{max} = 5.1$  pounds of OC/gallon of coating [maximum OC content of coating as applied after any thinning];

\* $CMU_{max} = 583$  gallons of cleanup material/2000 hours [maximum average hourly cleanup material usage];

and

\* $CMD = 6.890$  pounds of OC/gallon of cleanup material [density of cleanup material]

Emission Limitations: 1.0 lb/hr of any individual HAP and 4.4 tpy of any individual HAP

Applicable Compliance Method: The individual HAP emission limitations reflect the emissions unit's potentials to emit and were established based upon the following information:

$PTE[IHAP]_h = (CARC_{max}) \times (IHAPC_{max}) + (CMU_{max}) \times (CMD) \times (\%IHAP_{max})$ ; and

$PTE[IHAP]_y = (PTE[IHAP]_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds})$ .

Where:

\* $PTE[IHAP]_h$  = 1.0 pound of individual HAP/hour [hourly potential to emit individual HAP];  
 \* $PTE[IHAP]_y$  = 4.4 tons of individual HAP/year [yearly potential to emit individual HAP];  
 \* $CARC_{max}$  = 0.81 gallon of coating/hour [maximum coating application rate capacity];  
 \* $IHAPC_{max}$  = 0.033 pound of individual HAP/gallon of coating [maximum individual HAP content of coating as applied after any thinning];  
 \* $CMU_{max}$  = 583 gallons of cleanup material/2000 hours [maximum average hourly cleanup material usage];  
 \* $CMD$  = 6.890 pounds of OC/gallon of cleanup material [density of cleanup material]; and  
 \* $\%IHAP_{max}$  = 0.47 [maximum individual HAP fraction by weight of cleanup material]  
 Emission Limitations: 3.5 lbs/hr of any HAP combination and 15.3 tpy of any HAP combination

Applicable Compliance Method: The combined HAP emission limitations reflect the emissions unit's potentials to emit and were established based upon the following information:

$PTE[CHAP]_h = (CARC_{max}) \times (CHAPC_{max}) + (CMU_{max}) \times (CMD) \times (\%CHAP_{max})$ ; and

$PTE[CHAP]_y = (PTE[CHAP]_h) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds})$ .

Where:

\* $PTE[CHAP]_h$  = 3.5 pounds of combined HAP/hour [hourly potential to emit combined HAP];  
 \* $PTE[CHAP]_y$  = 15.3 tons of combined HAP/year [yearly potential to emit combined HAP];  
 \* $CARC_{max}$  = 0.81 gallon of coating/hour [maximum coating application rate capacity];  
 \* $CHAPC_{max}$  = 2.2 pounds of combined HAP/gallon of coating [maximum combined HAP content of coating as applied after any thinning];  
 \* $CMU_{max}$  = 583 gallons of cleanup material/2000 hours [maximum average hourly cleanup material usage];  
 \* $CMD$  = 6.890 pounds of OC/gallon of cleanup material [density of cleanup material]; and  
 \* $\%CHAP_{max}$  = 0.85 [maximum combined HAP fraction by weight of cleanup material]

F. **Miscellaneous Requirements**

1. None