



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

9/2/2008

GREGORY STORMONT  
COLUMBUS FAIR AUTO AUCTION  
2222 NEW WORLD DRIVE  
COLUMBUS, OH 43207

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0125042494  
Permit Number: P0103617  
Permit Type: Initial Installation  
County: Franklin

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
Yes	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final 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.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc), from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
COLUMBUS FAIR AUTO AUCTION**

Facility ID: 0125042494  
Permit Number: P0103617  
Permit Type: Initial Installation  
Issued: 9/2/2008  
Effective: 9/2/2008  
Expiration: 9/2/2018





**Air Pollution Permit-to-Install and Operate**  
for  
**COLUMBUS FAIR AUTO AUCTION**

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**Final Permit-to-Install and Operate**  
**Permit Number:** P0103617  
**Facility ID:** 0125042494  
**Effective Date:** 9/2/2008

## Authorization

Facility ID: 0125042494  
Application Number(s): A0035501  
Permit Number: P0103617  
Permit Description: Facility-wide increase of 4.1 tons VOC/yr from five automotive coating spray booths resulting in an area source designation under the MACT rules.  
Permit Type: Initial Installation  
Permit Fee: \$1,000.00  
Issue Date: 9/2/2008  
Effective Date: 9/2/2008  
Expiration Date: 9/2/2018  
Permit Evaluation Report (PER) Annual Date: Feb 15, for Jan 1 - Dec 31

This document constitutes issuance to:

COLUMBUS FAIR AUTO AUCTION  
2222 NEW WORLD DRIVE  
COLUMBUS, OH 43207

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

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

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0103617  
 Permit Description: Facility-wide increase of 4.1 tons VOC/yr from five automotive coating spray booths resulting in an area source designation under the MACT rules.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>K003</b>
Company Equipment ID:	Paint Booth 3
Superseded Permit Number:	01-08530
General Permit Category and Type:	Not Applicable

**Group Name: Automotive priming 1 & 2**

<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	Prime booth 1
Superseded Permit Number:	01-08530
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	Prime booth 2
Superseded Permit Number:	01-08530
General Permit Category and Type:	Not Applicable

**Group Name: Automotive refinishing 4 & 5**

<b>Emissions Unit ID:</b>	<b>K004</b>
Company Equipment ID:	Paint booth 4
Superseded Permit Number:	01-08530
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K005</b>
Company Equipment ID:	Paint booth 5
Superseded Permit Number:	01-08530
General Permit Category and Type:	Not Applicable



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**Facility ID:** 0125042494

**Effective Date:** 9/2/2008

## **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 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 Ohio EPA DAPC, Central District Office 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 being permanently shut down without first applying for and obtaining a permit pursuant to 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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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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.



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Division of Air Pollution Control

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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0103617

**Facility ID:** 0125042494

**Effective Date:** 9/2/2008

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.



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**Final Permit-to-Install and Operate**

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**Effective Date:** 9/2/2008

## **C. Emissions Unit Terms and Conditions**



**1. K003, Paint Booth 3**

**Operations, Property and/or Equipment Description:**

automotive refinishing booth 3 w/oven vented to filter

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. See d)(2), d)(3), and d)(4).

(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 operations(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. 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(E) (voluntary restrictions to avoid BAT, modification of PTI 01-08530, issued 3/12/02)	See b)(2)a below.
b.	OAC rule 3745-21-09(U)(1)	Exempt per OAC rule 3745-21-09(U)(2)(c).
c.	OAC rule 3745-17-07(A)(1)	See b)(2)b below
d.	OAC rule 3745-17-11(A)(2), Figure II	Particulate emissions from the booth stack shall not exceed 0.38 lb/hr.
e.	40 CFR 63 Subpart HHHHHH	See b)(2)c below.

(2) Additional Terms and Conditions

a. The permit for these air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. The emissions of VOC from this emissions unit shall not exceed 7.5 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- ii. The maximum annual usage for emissions unit K003 shall not exceed 1660 gallons base coat, 880 gallons clear coat and 200 gallons of solvent based on a rolling, 12-month summation of monthly usages.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
- c. The permittee must submit an initial notification, as an existing area source, to the USEPA no later than January 11, 2010, that the source would be subject to the standards and when the source will be in compliance with the standards.

The final rule applies to all motor vehicle surface coating operations. However, the owner or operator of a motor vehicle surface coating operation, may petition the Administrator for an exemption from this subpart if it can be demonstrated, to the satisfaction of the Administrator, that coatings that contain the target HAP are not spray applied. Petitions must include a description of the coatings that are spray applied and a certification that any coatings containing the target HAP are not spray applied by the permittee.

If circumstances change such that the permittee intends to spray apply coatings that contain the target HAP, the initial notification must be submitted as required by 63.11175 and the permittee must comply with the requirements of this subpart. Coatings are considered to contain the target HAP if they contain any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass or greater than 1.0 percent by mass for any other individual target HAP. For the purpose of determining whether materials contain the target HAP (that is, compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)), formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), may be used as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens and at 1.0 percent by mass or more for other target HAP compounds.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions for each emissions unit:
  - a. The name and identification of each type of coating and cleanup material employed.



- b. The VOC content of each type of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
- c. The VOC content of each type of cleanup material, in pounds per gallon.
- d. The number of gallons of each type of coating and cleanup material employed.
- e. The number of gallons of each type of cleanup material drummed for shipment off-site.
- f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons. i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content).
- g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage figures;
- h. Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month; and
- i. the rolling, 12-month summation of VOC emissions (i.e., the VOC emissions from the current month added to the summation of the VOC emissions from the previous 11 months).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- (2) The permit-to-install (PTI), permit-to-install and operate (PTIO), or federally enforceable permit-to-install and operate (FEPTIO) application for these emissions units K003, K004 and K005 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 AToxic Air Contaminant Statute<sup>®</sup>, 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 AReview of New Sources of Air Toxic Emissions, Option A<sup>®</sup>, 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)  $\Delta$ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\Delta$ ; or
- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH)  $\Delta$ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\Delta$ ; 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.,  $\Delta X \Delta$  hours per day and  $\Delta Y \Delta$  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  $\Delta$ worst case $\Delta$  toxic contaminant(s):

Toxic Contaminant: xylene

TLV (mg/m<sup>3</sup>): 651

Maximum Hourly Emission Rate (lbs/hr): 3.09

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 741

MAGLC (ug/m<sup>3</sup>): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions units K003, K004, K005, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the  $\Delta$ Toxic Air Contaminant Statute $\Delta$ , ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (3) 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 $\Delta$ , 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 AToxic Air Contaminant Statute<sup>®</sup> 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 AToxic Air Contaminant Statute<sup>®</sup>, 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 PTI, PTIO, or FEPTIO (as applicable) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute<sup>®</sup>, 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 Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute<sup>®</sup>, 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 AToxic Air Contaminant Statute<sup>®</sup>, 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 AToxic Air Contaminant Statute<sup>®</sup>, 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.



[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (5) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

- (2) The permittee shall notify the Central District Office in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
- (3) 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 ΔToxic Air Contaminant Statute<sup>Δ</sup>, 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

The emissions of VOC from emissions unit K003 shall not exceed 7.5 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual VOC emission limit shall be determined by summing the monthly emissions for the rolling, 12-month period, i.e., the value calculated in d(1)(i) above.

The VOC content of the coatings and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of 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 or 24A.

b. Emissions Limitation:

The maximum annual usage for each emissions unit shall not exceed 1660 gallons basecoat, 880 gallons Clearcoat and 200 gallons of solvent based on a rolling, 12-month summation of monthly usages.

Applicable Compliance Method:

Compliance with the annual usage restrictions shall be determined by summing the monthly usages for the rolling, 12-month period, i.e., the value calculated in d(1)(c) above.

c. Emissions Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a)] and [OAC rule 3745-17-07(A)(1)]

d. Emissions Limitation:

Particulate emissions from the booth stack shall not exceed 0.38 lb/hr.

Applicable Compliance Method:

Compliance shall be determined through calculation with the maximum uncontrolled emission rate derived from the maximum hourly usage of 1.5 gallons/hr multiplied times the maximum density of 7.26 lbs/gallon multiplied times the percent solids (0.47) multiplied times the transfer efficiency (1 – 0.625) with the uncontrolled emission (1.92 lbs/hr) multiplied times 0.2 to determined the hourly allowable emission rate.

[OAC rule 3745-17-11(A)(2) Figure II]

g) Miscellaneous Requirements

- (1) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 01-08530 issued on 3/12/02.



**2. Emissions Unit Group - Automotive priming 1 & 2: K001, K002,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K001	automotive refinishing booth 1 vented to filter
K002	automotive refinishing booth 2 vented to filter

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. 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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(E) (voluntary restriction to avoid BAT, modification of PTI 01-08530 issued 3/12/02)	See b)(2)a below.
b.	OAC rule 3745-21-09(U)(1)	Exempt per OAC rule 3745-21-09(U)(2)(c).
c.	OAC rule 3745-17-07(A)(1)	See b)(2)b below
d.	OAC rule 3745-17-11(A)(2) Figure II	Particulate emissions from the booth stack shall not exceed 0.45 lb/hr
e.	40 CFR 63 Subpart HHHHHH	See b)(2)c below.

(2) Additional Terms and Conditions

a. The permit for these air contaminant sources takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. The emissions of VOC from this emissions unit shall not exceed 1.6 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
  - ii. The maximum annual usage for each emissions unit K001 and K002 shall not exceed 500 gallons coating and 140 gallons of solvent based on a rolling, 12-month summation of monthly usages.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

[OAC rule 3745-17-07(A)(1)]

- c. The permittee must submit an initial notification, as an existing area source, to the USEPA no later than January 11, 2010, that the source would be subject to the standards and when the source will be in compliance with the standards.

The final rule applies to all motor vehicle surface coating operations. However, the owner or operator of a motor vehicle surface coating operation, may petition the Administrator for an exemption from this subpart if it can be demonstrated, to the satisfaction of the Administrator, that coatings that contain the target HAP are not spray applied. Petitions must include a description of the coatings that are spray applied and a certification that any coatings containing the target HAP are not spray applied by the permittee.

If circumstances change such that the permittee intends to spray apply coatings that contain the target HAP, the initial notification must be submitted as required by 63.11175 and the permittee must comply with the requirements of this subpart. Coatings are considered to contain the target HAP if they contain any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass or greater than 1.0 percent by mass for any other individual target HAP. For the purpose of determining whether materials contain the target HAP (that is, compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)), formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), may be used as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens and at 1.0 percent by mass or more for other target HAP compounds.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions for each emissions unit:
  - a. The name and identification of each type of coating and cleanup material employed.



- b. The VOC content of each type of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
- c. The VOC content of each type of cleanup material, in pounds per gallon.
- d. The number of gallons of each type of coating and cleanup material employed.
- e. The number of gallons of each type of cleanup material drummed for shipment off-site.
- f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons. i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content).
- g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage figures;
- h. Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month; and
- i. the rolling, 12-month summation of VOC emissions (i.e., the VOC emissions from the current month added to the summation of the VOC emissions from the previous 11 months).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- (2) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute<sup>2</sup>, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[ORC 3704.03(F)(3)(c) and F(4)]

- (3) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall



cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

- (2) The permittee shall notify the Central District Office in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1)a and b)(1)c of these terms and conditions shall be determined in accordance with the following method.

- a. Emissions Limitation:

The emissions of VOC from each emissions unit K001 and K002 shall not exceed 1.6 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual VOC emission limit shall be determined by summing the monthly emissions for the rolling, 12-month period, i.e., the value calculated in section d)(1)j above.

The VOC content of the coatings and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of 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 or 24A.

- b. Emissions Limitation:

The maximum annual usage for emissions units K001 and K002 shall not exceed 500 gallons coating and 140 gallons of solvent based on a rolling, 12-month summation of monthly usages.

Applicable Compliance Method:

Compliance with the annual usage restrictions shall be determined by summing the monthly usages for the rolling, 12-month period, i.e., the value calculated in d)(1)d above.

- c. Emissions Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a)] and [OAC rule 3745-17-07(A)(1)]

d. Emissions Limitation:

Particulate emissions from the booth stack shall not exceed 0.45 lb/hr.

Applicable Compliance Method:

Compliance shall be determined through calculation with the maximum uncontrolled emission rate derived from the maximum hourly usage of 1.5 gallons/hr multiplied times the maximum density of 7.1 lbs/gallon multiplied times the percent solids (0.56) multiplied times the transfer efficiency (1 – 0.625) with the resulting uncontrolled emission (2.23 lbs/hr) multiplied times 0.2 to determined the hourly allowable emission rate.

[OAC rule 3745-17-11(A)(2) Figure II]

g) Miscellaneous Requirements

- (1) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 01-08530 issued on 3/12/02.



**3. Emissions Unit Group - Automotive refinishing 4 & 5: K004, K005,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K004	automotive refinishing booth 4 w/oven vented to filter
K005	automotive refinishing booth 5 w/oven vented to filter

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. See d)(2), d)(3), and d)(4).

(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 operations(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. 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(E) (voluntary restriction to avoid BAT, modification of PTI 01-08530 issued 3/12/02)	See b)(2)a below.
b.	OAC rule 3745-21-09(U)(1)	Exempt per OAC rule 3745-21-09(U)(2)(c).
c.	OAC rule 3745-17-07(A)(1)	See b)(2)b below
d.	OAC rule 3745-17-11(A)(2) Figure II	Particulate emissions from the booth stack shall not exceed 0.38 lb/hr.
e.	40 CFR 63 Subpart HHHHHH	See b)(2)c below.

(2) Additional Terms and Conditions

a. The permit for these air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. The emissions of VOC from this emissions unit shall not exceed 4.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- ii. The maximum annual usage for emissions unit K004 and K005 shall not exceed 830 gallons base coat, 440 gallons clear coat and 160 gallons of solvent based on a rolling, 12-month summation of monthly usages.
- b. Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
- c. The permittee must submit an initial notification, as an existing area source, to the USEPA no later than January 11, 2010, that the source would be subject to the standards and when the source will be in compliance with the standards.

The final rule applies to all motor vehicle surface coating operations. However, the owner or operator of a motor vehicle surface coating operation, may petition the Administrator for an exemption from this subpart if it can be demonstrated, to the satisfaction of the Administrator, that coatings that contain the target HAP are not spray applied. Petitions must include a description of the coatings that are spray applied and a certification that any coatings containing the target HAP are not spray applied by the permittee.

If circumstances change such that the permittee intends to spray apply coatings that contain the target HAP, the initial notification must be submitted as required by 63.11175 and the permittee must comply with the requirements of this subpart. Coatings are considered to contain the target HAP if they contain any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass or greater than 1.0 percent by mass for any other individual target HAP. For the purpose of determining whether materials contain the target HAP (that is, compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)), formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), may be used as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens and at 1.0 percent by mass or more for other target HAP compounds.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual VOC emissions for each emissions unit:
  - a. The name and identification of each type of coating and cleanup material employed.



- b. The VOC content of each type of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon.
- c. The VOC content of each type of cleanup material, in pounds per gallon.
- d. The number of gallons of each type of coating and cleanup material employed.
- e. The number of gallons of each type of cleanup material drummed for shipment off-site.
- f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons. i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content).
- g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage figures;
- h. Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month; and
- i. the rolling, 12-month summation of VOC emissions (i.e., the VOC emissions from the current month added to the summation of the VOC emissions from the previous 11 months).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- (2) The permit-to-install (PTI), permit-to-install and operate (PTIO), or federally enforceable permit-to-install and operate (FEPTIO) application for these emissions units K003, K004 and K005 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 AToxic Air Contaminant Statute<sup>®</sup>, 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 AReview of New Sources of Air Toxic Emissions, Option A<sup>®</sup>, 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)  $\Delta$ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\Delta$ ; or
- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH)  $\Delta$ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\Delta$ ; 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.,  $\Delta X \Delta$  hours per day and  $\Delta Y \Delta$  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  $\Delta$ worst case $\Delta$  toxic contaminant(s):

Toxic Contaminant: xylene

TLV (mg/m3): 651

Maximum Hourly Emission Rate (lbs/hr): 3.09

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 741

MAGLC (ug/m3): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions units K003, K004, K005, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the  $\Delta$ Toxic Air Contaminant Statute $\Delta$ , ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (3) 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 $\Delta$ , 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 AToxic Air Contaminant Statute<sup>®</sup> 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 AToxic Air Contaminant Statute<sup>®</sup>, 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 PTI, PTIO, or FEPTIO (as applicable) 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute<sup>®</sup>, 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 Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute<sup>®</sup>, 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 AToxic Air Contaminant Statute<sup>®</sup>, 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 AToxic Air Contaminant Statute<sup>®</sup>, 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.



[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (5) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

- (2) The permittee shall notify the Central District Office in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
- (3) 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 Atoxic 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

The emissions of VOC from each emissions unit K004 and K005 shall not exceed 4.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual VOC emission limit shall be determined by summing the monthly emissions for the rolling, 12-month period, i.e., the value calculated in d(1)(i) above.

The VOC content of the coatings and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of 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 or 24A.

b. Emissions Limitation:

The maximum annual usage for each emissions unit shall not exceed 830 gallons basecoat, 440 gallons Clearcoat and 160 gallons of solvent based on a rolling, 12-month summation of monthly usages.

Applicable Compliance Method:

Compliance with the annual usage restrictions shall be determined by summing the monthly usages for the rolling, 12-month period, i.e., the value calculated in d(1)(c) above.

c. Emissions Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a)] and [OAC rule 3745-17-07(A)(1)]

d. Emissions Limitation:

Particulate emissions from the booth stack shall not exceed 0.38 lb/hr.

Applicable Compliance Method:

Compliance shall be determined through calculation with the maximum uncontrolled emission rate derived from the maximum hourly usage of 1.5 gallons/hr multiplied times the maximum density of 7.26 lbs/gallon multiplied times the percent solids (0.47) multiplied times the transfer efficiency (1 – 0.625) with the uncontrolled emission (1.92 lbs/hr) multiplied times 0.2 to determined the hourly allowable emission rate.

[OAC rule 3745-17-11(A)(2) Figure II]

g) Miscellaneous Requirements

- (1) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 01-08530 issued on 3/12/02.