



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

9/8/2008

Certified Mail

ANGELO PAPOTTO
SUBURBAN COLLISION CENTER
26618 BROOKPARK RD
NORTH OLMSTED, OH 44070

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318378453
Permit Number: P0095664
Permit Type: Renewal
County: Cuyahoga

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Cleveland Division of Air Quality
Penton Media Building, 4th Floor
1300 East 9th Street
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
CDAQ; Pennsylvania; Canada

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

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

There are two paint spray booths (K001 and K002) used for refinishing used automobiles. Both booths are also used to cure the vehicle once it has been painted. The booths' doors are closed and the heater brings the booths' internal temperature to approximately 165 degrees Fahrenheit. There are many different potential coatings used in the booth and all calculations were based on the worst case VOC and HAP coatings, respectively. The facility has requested their permit include synthetic minor restrictions.

3. Facility Emissions and Attainment Status:

The facility has a PTE of 44.74 tpy VOC and actual emissions of 10.66 TPY VOC. The facility PTE for HAPs is 20.10 tpy for all HAPs combined. The highest individual HAP, counting both booths, is xylene and has a PTE of 13.26, however, actual emissions are calculated to be 5.16 for both booths. Air toxics were evaluated. Xylene, MAK and n-Butyl acetate were modeled for using Screen 3 and none exceeded the predicted MAGLC.

Cuyahoga County is designated as non-attainment for ozone.

4. Source Emissions:

The facility does not have a PTE over 100 tpy for VOC and does not emit more than 25 tpy of an combination of HAPs, however, the worst case HAP coating brings the HAP PTE for xylene over 10 tpy. Actual facility emissions calculate at 3.18 tpy for xylene for both booths.

5. Conclusion:

Suburban Collision, North Olmsted, meets Title V applicability for exceeding 10 tpy for an individual HAP, xylene. Actual emissions for the facility for xylene are significantly lower that the threshold. Air toxics have been evaluated and have not exceeded allowable concentrations. The facility will restrict HAP emissions to less than 9.0 tpy for a single HAP and 20 tpy for combined HAPs.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (K001)	7.34 tpy & 36.6
VOC (K002)	lbs/hr
Single HAP	7.34 tpy & 36.6
Combined HAPs	lbs/hr
	9.0 tpy
	20.0 tpy

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
SUBURBAN COLLISION CENTER

Issue Date: 9/8/2008
Permit Number: P0095664
Permit Type: Renewal
Permit Description: Renewal FEPTIO
Facility ID: 1318378453
Facility Location: SUBURBAN COLLISION CENTER
26618 BROOKPARK RD,
NORTH OLMSTED, OH 44070
Facility Description: Automotive Body, Paint, and Interior Repair and Maintenance

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, Penton Media Building, 4th Floor 1300 East 9th Street or (216)664-2297. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



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

DRAFT

**Air Pollution Permit-to-Install and Operate
for
SUBURBAN COLLISION CENTER**

Facility ID: 1318378453
Permit Number: P0095664
Permit Type: Renewal
Issued: 9/8/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
 for
 SUBURBAN COLLISION CENTER

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

 2. Who is responsible for complying with this permit? 4

 3. What records must I keep under this permit? 4

 4. What are my permit fees and when do I pay them?..... 4

 5. When does my PTIO expire, and when do I need to submit my renewal application? 4

 6. What happens to this permit if my project is delayed or I do not install or modify my source? 5

 7. What reports must I submit under this permit? 5

 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? 5

 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?... 5

 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6

 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6

 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6

 13. Can I transfer this permit to a new owner or operator? 6

 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7

 15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions..... 8

C. Emissions Unit Terms and Conditions 12

 1. K001, SPRAY PAINT BOOTH..... 13

 2. K002, SPRAY PAINT BOOTH..... 19



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0095664

Facility ID: 1318378453

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1318378453
Application Number(s): A0027248
Permit Number: P0095664
Permit Description: Renewal FEPTIO
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 9/8/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

SUBURBAN COLLISION CENTER
26618 BROOKPARK RD
NORTH OLMSTED, OH 44070

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:

Cleveland Division of Air Quality
Penton Media Building, 4th Floor
1300 East 9th Street
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

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0095664

Facility ID: 1318378453

Effective Date: To be entered upon final issuance

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 Cleveland Division of Air Quality 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

Draft Permit-to-Install and Operate

Permit Number: P0095664

Facility ID: 1318378453

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0095664

Facility ID: 1318378453

Effective Date: To be entered upon final issuance

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) 2., 3., 4., and 5.

3. Applicable Emissions Limitations and/or Control Requirements

a) The following emissions limitations and/or control measures apply to emissions units K001, K002 and K003. Emissions from these units 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
(1)	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and MACT, subpart Mmmm	See 2.b)(1).

b) Additional Terms and Conditions

(1) The emissions of hazardous air pollutants (HAP[s]) from emissions units K001, K002 and K003 shall not exceed 9.0 tons per year for any single HAP and 20.0 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.

4. Monitoring and/or Recordkeeping Requirements

a) The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002 and K003):

(1) the name and identification number of each HAP containing material employed;

(2) the individual HAP content for each HAP, in pounds of individual HAP per pound of material;

(3) the total combined HAP content, in pounds of combined HAPs per pound of material [sum all the individual HAP contents from (2)];

(4) the number of pounds of each HAP containing material employed;



- (5) the total individual HAP usage for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (2) times (4) for each material];
- (6) the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (3) times (4) for each material];
- (7) the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- (8) the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on a individual emissions unit basis.

5. Reporting Requirements

a) The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

- (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

Emissions unit ID	Term & Condition
K001, K002, K003	2.b)(1)

- (2) the probable cause of each deviation (excursion);
- (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- (4) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).



6. Testing Requirements

a) Compliance with the emission limitations in 2.a) shall be determined in accordance with the following methods:

(1) Emission Limitation
9.0 tpy single HAP (total for emissions units K001, K002 and K003)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in 3.and 4. above, respectively.

(2) Emission Limitation
20.0 tpy combined HAP (total for emissions units K001, K002 and K003)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting in 3. and 4. above, respectively.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0095664

Facility ID: 1318378453

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K001, SPRAY PAINT BOOTH

Operations, Property and/or Equipment Description:

Spraybake paint spray booth with exempt air heater

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. d)(6), d)(7), d)(8), d)(9) and e)(3).

(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(A)(3)	7.34 tpy VOC (including clean-up) 36.6 lbs VOC /day.
b.	OAC rule 3745-21-09(U)(1)	Not applicable, pursuant to OAC rule 3745-21-09(U)(2)(c).
c.	OAC rule 3745-17-11(C)	See (2)a.

(2) Additional Terms and Conditions

a. The permittee shall operate the dry exhaust filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry exhaust filtration system shall be employed during all periods of coating application to control particulate emissions.

c) Operational Restrictions

a. None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information daily for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds per gallon, as applied;
 - c. the amount, in gallons, of each coating employed;
 - d. the name and identification of each cleanup material, as applied;
 - e. the VOC content of each cleanup material, in pounds per gallon, as applied;
 - f. the amount, in gallons, of each cleanup material employed;
 - g. the total VOC emissions from all coatings employed, in pounds [summation of (b*c) for each coating and cleanup material];
 - h. the total VOC emissions from all cleanup materials employed, in pounds [summation of (e*f) for each coating and cleanup material]; and
 - i. the total VOC emissions from all coatings and cleanup materials employed, in pounds [summation of (g+h)].
- (2) The permittee shall collect and record the total daily VOC emissions from all coatings and cleanup materials for this emissions unit for the purpose of determining annual VOC emissions.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry exhaust filtration system with any modifications deemed necessary by the permittee during the time period in which the dry exhaust filtration system is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry exhaust filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry exhaust filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.



The permittee shall document each inspection of the dry exhaust filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) In the event that the dry exhaust filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry exhaust filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry exhaust filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (6) The permit to install for this emissions unit 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(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 "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(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) "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 American Conference of Governmental Industrial Hygienists (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 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 “worst case” toxic contaminant(s):

Pollutant: Xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 1.64

Predicted 1-Hour Maximum Ground-Level Concentration (g/m³): 125.9 g/m³

MAGLC (g/m³): 10337.91

Pollutant: Methyl n-amyl ketone

TLV (mg/m³): 233.50

Maximum Hourly Emission Rate (lbs/hr): 0.82

Predicted 1-Hour Maximum Ground-Level Concentration (g/m³): 62.96 g/m³

MAGLC (g/m³): 5559.52

Pollutant: n-Butyl acetate

TLV (mg/m³): 712.64

Maximum Hourly Emission Rate (lbs/hr): 2.33

Predicted 1-Hour Maximum Ground-Level Concentration (g/m³): 178.9 g/m³

MAGLC (g/m³): 16967.62

The permittee, has demonstrated that emissions of the above listed toxic contaminants from emissions unit K001, 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 Toxic Air Contaminant Statute, ORC 3704.03(F).

- (7) 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 in the predicted 1-hour maximum ground-level concentration⁶, 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 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 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.

- (8) 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 Maximum Acceptable Ground-Level Concentration (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(s) 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(s) or the materials applied.

- (9) 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) 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.

- (2) The permittee shall include in the permit evaluation report any record of the date and length of time the dry exhaust filtration system was not in service during coating application. The permit evaluation report shall be submitted annually, at a minimum, to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.
- (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 Toxic 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.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
7.34 tpy VOC (including clean-up)

Applicable Compliance Method
Compliance shall be determined based on the record keeping from d)(1) and d)(2). The annual emissions shall be the sum of the total VOC emissions from each day for each calendar year.
 - b. Emission Limitation
36.6 lbs VOC/day

Applicable Compliance Method
Compliance shall be determined based on the record keeping in d)(1) to determine the daily emission rate.

g) Miscellaneous Requirements

- (1) None.



2. K002, SPRAY PAINT BOOTH

Operations, Property and/or Equipment Description:

Spraybake paint spray booth with exempt air heater

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. d)(6), d)(7), d)(8), d)(9) and e)(3).

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(A)(3)	7.34 tpy VOC (including clean-up) 36.6 lbs VOC /day.
b.	OAC rule 3745-21-09(U)(1)	Not applicable, pursuant to OAC rule 3745-21-09(U)(2)(c).
c.	OAC rule 3745-17-11(C)	See (2)a.

(2) Additional Terms and Conditions

a. The permittee shall operate the dry exhaust filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The dry filtration system shall be employed during all periods of coating application to control particulate emissions.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information daily for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds per gallon, as applied;
 - c. the amount, in gallons, of each coating employed;
 - d. the name and identification of each cleanup material, as applied;
 - e. the VOC content of each cleanup material, in pounds per gallon, as applied;
 - f. the amount, in gallons, of each cleanup material employed;
 - g. the total VOC emissions from all coatings employed, in pounds [summation of (b*c) for each coating and cleanup material];
 - h. the total VOC emissions from all cleanup materials employed, in pounds [summation of (e*f) for each coating and cleanup material]; and
 - i. the total VOC emissions from all coatings and cleanup materials employed, in pounds [summation of (g+h)].
- (2) The permittee shall collect and record the total daily VOC emissions from all coatings and cleanup materials for this emissions unit for the purpose of determining annual VOC emissions.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry exhaust filtration system with any modifications deemed necessary by the permittee during the time period in which the dry exhaust filtration system is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry exhaust filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry exhaust filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the dry exhaust filtration system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the dry exhaust filtration system by maintaining a record that includes the date of the inspection, a description of each



problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) In the event that the dry exhaust filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry exhaust filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (6) The permit to install for this emissions unit 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(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 "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(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) "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 American Conference of Governmental Industrial Hygienists (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 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 “worst case” toxic contaminant(s):

Pollutant: Xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 1.64

Predicted 1-Hour Maximum Ground-Level Concentration (g/m³): 125.9 g/m³

MAGLC (g/m³): 10337.91

Pollutant: Methyl n-amyl ketone

TLV (mg/m³): 233.50

Maximum Hourly Emission Rate (lbs/hr): 0.82

Predicted 1-Hour Maximum Ground-Level Concentration (g/m³): 62.96 g/m³

MAGLC (g/m³): 5559.52

Pollutant: n-Butyl acetate

TLV (mg/m³): 712.64

Maximum Hourly Emission Rate (lbs/hr): 2.33

Predicted 1-Hour Maximum Ground-Level Concentration (g/m³): 178.9 g/m³

MAGLC (g/m³): 16967.62

The permittee, has demonstrated that emissions of the above listed toxic contaminants from emissions unit K002, 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 Toxic Air Contaminant Statute, ORC 3704.03(F).

- (7) 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 in 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:
- 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;
 - 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 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 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.

- (8) 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 Maximum Acceptable Ground-Level Concentration (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(s) 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(s) or the materials applied.

- (9) 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) 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.

- (2) The permittee shall include in the permit evaluation report any record of the date and length of time the dry exhaust filtration system was not in service during coating application. The permit evaluation report shall be submitted annually, at a minimum, to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.
- (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 Toxic 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.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
7.34 tpy VOC (including clean-up)

Applicable Compliance Method
Compliance shall be determined based on the record keeping from d)(1) and d)(2). The annual emissions shall be the sum of the total VOC emissions from each day for each calendar year.
 - b. Emission Limitation
36.6 lbs VOC/day

Applicable Compliance Method
Compliance shall be determined based on the record keeping in d)(1) to determine the daily emission rate.

g) Miscellaneous Requirements

- (1) None.