State of Ohio Environmental Protection Agency

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

Certified Mail

9/29/2009

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

Marybeth Nassief
Nassief Ford-Mercury Inc dbaNassief Ford-Mercury Toyota
1059 State Route 46 North
Jefferson, OH 44047

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0204062003
Permit Number: P0105471
Permit Type: Initial Installation
County: Ashtabula

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, 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, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NEDO

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate

for

Nassief Ford-Mercury Inc dbaNassief Ford-Mercury Toyota

Facility ID:	0204062003
Permit Number:	P0105471
Permit Type:	Initial Installation
Issued:	9/29/2009
Effective:	9/29/2009
Expiration:	9/29/2019

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Nassief Ford-Mercury Inc dbaNassief Ford-Mercury Toyota

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Authorization

Facility ID: 0204062003
Application Number(s): A0038318
Permit Number: P0105471
Permit Description: The LSC work station set-up consists of a designated area within the facility. The work station will have adequate ventilation and the space will be separated from adjacent areas by temporary partitions. The area within the partitions will contain a vehicle lift, and a tarp will cover the floor to collect limited overspray or drips. Two Vaupel HSDR 3300 spray guns will be used to apply the LSC anti-corrosion materials, with one spray gun designated for each material.
Permit Type: Initial Installation
Permit Fee: $200.00
Issue Date: 9/29/2009
Effective Date: 9/29/2009
Expiration Date: 9/29/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

Nassief Ford-Mercury Inc dbaNassief Ford-Mercury Toyota
1059 St Rte 46
Jefferson, OH 44047

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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: P0105471
Permit Description: The LSC work station set-up consists of a designated area within the facility. The work station will have adequate ventilation and the space will be separated from adjacent areas by temporary partitions. The area within the partitions will contain a vehicle lift, and a tarp will cover the floor to collect limited overspray or drips. Two Vaupel HSDR 3300 spray guns will be used to apply the LSC anti-corrosion materials, with one spray gun designated for each material.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	LSC Work Station
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

   This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

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

   The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

   The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

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

   You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

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

   There are two fees associated with permitted air contaminant sources in Ohio:

   - PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

     You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

   - Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

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

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions 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, Northeast 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 change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. K001, LSC Work Station

Operations, Property and/or Equipment Description:

The LSC work station set-up consists of a designated area within the facility. The work station will have adequate ventilation and the space will be separated from adjacent areas by temporary partitions. The area within the partitions will contain a vehicle lift, and a tarp will cover the floor to collect limited overspray or drips. Two Vaupel HSDR 3300 spray guns will be used to apply the LSC anti-corrosion materials, with one spray gun designated for each material.

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(A)(3)(a) ORC 3704.03(T)(4)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of particulate matter 10 microns or less in diameter (PM10) and volatile organic compounds (VOC) from this air contaminant source since the calculated uncontrolled potentials to emit for PM10 and VOCs are each less than 10 tons per year. [The work practice provisions in this permit reflect BAT if it was applicable.] See b)(2)b.
b.	OAC rule 3745-21-18(C) [See b)(2)d.]	The VOC content of the coating materials applied shall not exceed 7.0 pounds VOC per gallon, excluding water and exempt

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		solvents.
c.	OAC rule 3745-21-09(U)(1)	Exempt, pursuant to OAC rule 3745-21-09(U)(2)(c).
d.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(b)	See d)(2) through d)(4).

(2) Additional Terms and Conditions

a. The permittee shall apply for and obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in materials, or change in the method of operation that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

b. This emissions unit's potentials to emit for PM10* and VOCs are 0.20 and 2.0 tons per year, respectively. Potential emissions were determined as follows:

i. For PM10- multiply the permittee-derived emission factor of 0.3 lb PM10/vehicle** by the maximum number of vehicles coated per year (1398 vehicles/year), and then divide by 2000 lbs per ton.

ii. For VOCs – multiply the permittee-derived emission factor of 2.8 lbs VOC/vehicle*** by the maximum number of vehicles coated per year (1398 vehicles/year), and then divide by 2000 lbs per ton.

*All emissions of particulate matter are assumed to be PM10.

** lb PM10/vehicle= lb PM10/vehicle from the application of Nox-Rust X128T or equivalent substitute [(0.793 gallon/vehicle) x (7.304 lbs/gallon of coating) x (0.5208 solids, by weight) x (1-0.925 transfer efficiency)] + lb PM10/vehicle from Nox-Rust 712AM or equivalent substitute [(0.528 gallon/vehicle) x (7.855 lbs/gallon of coating) x (0.979 solids, by weight) x (1-.99 transfer efficiency)] = 0.3 lb PM10/vehicle

*** lbs VOC/vehicle= lb VOC/vehicle from Nox-Rust X128T or equivalent substitute [(0.793 gallon/vehicle) x (3.5 lb VOC/gallon of coating) + lb VOC/vehicle from Nox-Rust 712AM or equivalent substitute [(0.528 gallon/vehicle) x (0.165 lb VOC/gallon of coating)] = 2.8 lbs/vehicle

c. PE from this emissions unit are negligible (potential to emit is less than 0.3 ton per year) and, therefore; they have not been addressed in this permit.

d. This rule is only applicable to facilities located in the following counties: Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, Warren, or Summit.

c) Operational Restrictions

(1) The permittee shall only employ a spray gun (Vaupel HDSR 3300) in this emissions unit that has a demonstrated capability of achieving emission reductions equivalent to HVLP or electrostatic spray application methods. The permittee shall submit the equivalency demonstration to the director of Ohio environmental protection agency for approval [any equivalent coating application method approved by the director will be submitted to the USEPA as a revision to the Ohio state implementation plan for ozone].

(2) The permittee shall ensure that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, in accordance with the manufacturer's specifications, and the handling of a coating and any solvents.

(3) If spray guns are cleaned on-site, the permittee shall ensure that that the spray guns used to apply mobile equipment repair and refinishing coatings are cleaned in an enclosed spray gun cleaning system (e.g., cold cleaner) that is kept closed when not in use.

(4) The following materials shall be stored in closed, non-absorbent, non-leaking containers when not in use:

a. Fresh coatings.

b. Used coatings.

c. Solvents.

d. VOC-containing additives and materials.

e. VOC-containing waste materials.

f. Cloth, paper, or absorbent applicators moistened with any of the items listed above.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and maintain monthly record of the following information for this emissions unit:

a. The number of vehicles processed.

b. The name and identification of each coating material employed.

c. The VOC content, in pounds per gallon, and, in pounds/gallon, excluding water and exempt solvents, of each coating material employed.

d. The volume, in gallons, of each coating material employed.

e. The total volume, in gallons, of all coating materials employed.

f. Each instance when the emissions unit was operated by an employee that was not properly trained in the use of the HVLP or equivalent applicator

[Items d and e above will be determined by the number of vehicles processed, using the following information:

Each vehicle processed utilizes one complete anti-corrosion materials kit. Each kit contains 0.793 gallons of Nox-Rust X128T or equivalent substitute and 0.528 gallons of Nox-Rust 712AM or equivalent substitute. The VOC content of Nox-Rust X128T or equivalent substitute is 3.5 lb/gallon, and the VOC content of Nox-Rust 712AM or equivalent substitute is 0.165 lb/gallon. The volume of each material employed will be tabulated by multiplying the number of vehicles by the gallons of materials used per vehicle.]

(2) The PTIO application for this emissions unit 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 "Toxic Air Contaminant Statute", 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 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";

   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 was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" 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 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant:: Stoddard Solvent

TLV (mg/m3): 571.4

Maximum Hourly Emission Rate (lbs/hr): 2.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8,628

MAGLC (ug/m3): 27,211

The permittee has demonstrated that emissions of Stoddard Solvent from this emissions unit 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).

(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", 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", ORC 3704.03(F), 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 FEPTIO 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.

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

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.

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

(2) The permittee shall submit a written report to the Director that includes all exceedances of the allowable VOC content of each coating material employed in this emissions unit. The report shall be submitted to the Director within forty-five days after each exceedance is discovered.

(3) The permittee shall identify the following information in the annual PER in accordance with the requirements listed above:

a. Each instance where the VOC content of any coating applied exceeded 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents;

b. The actual annual number of vehicles processed ;

c. The actual annual total number of gallons of each coating employed;

d. 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; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect; and

e. Each instance when the emissions unit was operated by an employee that was not properly trained in the use of the HVLP or equivalent applicator.

f) Testing Requirements

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

a. Emission Limitation:

The VOC content of the coating materials applied shall not exceed 7.0 pounds VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC emission limitation above based on the record keeping requirements in d)(1).

Formulation data (e.g., MSDS) or USEPA Method 24 shall be used to determine the VOC content of each coating.

g) Miscellaneous Requirements

(1) None.