



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL  
FRANKLIN COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 01-08737**

**DATE: 7/17/2003**

Combs Collision  
Paul Combs  
3766 Snouffer Rd  
Columbus, OH 43235-2778

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

CDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 7/17/2003  
Effective Date: 7/17/2003**

**FINAL PERMIT TO INSTALL 01-08737**

Application Number: 01-08737  
APS Premise Number: 0125232437  
Permit Fee: **\$800**  
Name of Facility: Combs Collision  
Person to Contact: Paul Combs  
Address: 3766 Snouffer Rd  
Columbus, OH 43235-2778

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**64 Israel St  
Westerville, Ohio**

Description of proposed emissions unit(s):  
**Paint booths 3 4 5 6.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**Combs Collision**  
**PTI Application: 01-08737**  
**Issued: 7/17/2003**

**Facility ID: 0125232437**

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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**Issued: 7/17/2003**

**Facility ID: 0125232437**

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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facility has been constructed in accordance with the Permit to Install application and the terms and

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**PTI Application: 01 09727**  
**Issued**

**Facility ID: 0125232437**

Emissions Unit ID: **K001**

conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	18.6
HAP	11.2

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Non-recirculating paint booth #1 with dry filtration system for the refinishing of motor vehicles	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 6.5 lbs/hr, excluding cleanup and 3.1 tons/yr, including cleanup. See A.2.a below.</p> <p>See B.1 through B.7 below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-35-07(B).</p>
	OAC rule 3745-35-07(B)	<p>VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per a rolling, 12-month summation.</p>
	OAC rule 3745-31-05(D)	<p>See B.3 thru B.6 below.</p>
	OAC rule 3745-21-09(U)(2)(c)	<p>See B.7 below.</p> <p>The VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.</p>

**2. Additional Terms and Conditions**

- 2.a The 6.5 pounds of VOC per hour limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
3. The maximum annual coating usage shall not exceed 800 gallons per a rolling, 12-month period. The permittee has existing records for this emissions unit, therefore a rolling, 12-month gallon usage table to monitor and restrict the first twelve months of usage is not necessary.
4. The maximum annual cleanup material usage shall not exceed 150 gallons per a rolling, 12-month period. The permittee has existing records for this emissions unit, therefore a rolling, 12-month gallon usage table to monitor and restrict the first twelve months of usage is not necessary.
5. The maximum VOC content of any coating employed shall not exceed 6.5 pounds per gallon.
6. The maximum VOC content of the cleanup material employed shall not exceed 6.7 pounds per gallon.
7. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitation shall be based on a rolling, 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification of each coating employed;
  - b. the VOC content of each of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon;
  - c. the individual Hazardous Air Pollutant (HAP)<sup>1</sup> content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
  - d. the total combined HAP content for each HAP of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];

- e. the number of gallons of each coating employed;
- f. the rolling, 12-month summation of gallons of coating employed;
- g. the name and identification of each cleanup material employed;
- h. the VOC content of each of cleanup material, in pounds per gallon;
- i. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- j. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (i)];
- k. the number of gallons of each cleanup material employed;
- l. the number of gallons of each type of cleanup material drummed for shipment off-site.
- m. the rolling, 12-month summation of gallons of cleanup material employed;
- n. 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);
- o. the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [for each HAP the sum of (c) times (f) for each coating plus the sum of (i) times (m) for each cleanup material];
- p. the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [the sum of (d) times (f) for each coating plus the sum of (j) times (m) for each cleanup material]; and
- q. the total VOC emissions per a rolling, 12-month summation of the monthly emissions.

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of solvents contained in the coating or clean up materials. This information does not have to be kept on a line-by-line basis.

Emissions Unit ID: **K001**

2. 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.
3. The permit to install for this emissions unit (K001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: N-Hexane

TLV (mg/m<sup>3</sup>): 176.2

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3MAGLC (ug/m<sup>3</sup>): 4196

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the

application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the annual VOC emission limitation (3.1 tons per year) for this emissions unit (K001). This report shall be submitted to the Central District Office within 30 days after the deviation occurs.
2. The permittee shall notify the Central District Office in writing of any daily record showing that the dry filtration system was not in service when the 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 quarterly deviation (excursion) reports which:
  - a. identify any exceedances of the gallons per year restrictions for the coatings (800 gallons per rolling, 12-month period) and cleanup materials (150 gallons per rolling, 12-month period) employed;

- b. identify any exceedances of the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period;
  - c. identify any exceedances of the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period; and
  - d. identify any exceedances of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
4. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.2.
  5. The permittee shall submit deviation (excursion) reports which identify any exceedances of the VOC content limitations for the coatings (6.5 pounds per gallon) and cleanup materials (6.7 pounds per gallon) employed. These reports shall be submitted by January 31 of each year.
  6. The permittee shall also submit annual reports which specify the total VOC emissions from K001-K006 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
VOC emissions shall not exceed 6.5 lbs/hr, excluding cleanup.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by multiplying the maximum VOC content of 6.5 pounds per gallon by the maximum gallons used of 1.0 gallon per hour.
  - b. Emission Limitation:  
VOC emissions shall not exceed 3.1 tons/yr, including cleanup.  
  
Applicable Compliance Method:  
Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.n of this permit.

**Combs Collision**  
**PTI Application: 01 00727**  
**Issued**

**Facility ID: 0125232437**

Emissions Unit ID: **K001**

- c. Emission Limitation:  
The total individual 9.9 HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.o of this permit..

- d. Emission Limitation:  
The total combined 24.9 HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.p of this permit.

- e. Emission Limitation:  
VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.q of this permit for each of the emissions units (K001-K006).

2. 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 an owner or operator determines that Method 24 of 40 CFR Part 60, Appendix A, 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.

## **F. Miscellaneous Requirements**

1. The terms and conditions in this permit supersede those identified in permit 01-08182, issued on June 21, 2000.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Non-recirculating paint booth #2 with dry filtration system for the refinishing of motor vehicles	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 6.5 lbs/hr, excluding cleanup and 3.1 tons/yr, including cleanup. See A.2.a below.
	OAC rule 3745-35-07(B)	See B.1 through B.7 below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-35-07(B).
	OAC rule 3745-31-05(D)	VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(2)(c)	See B.3 thru B.6 below.  See B.7 below.  The VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

**2. Additional Terms and Conditions**

- 2.a The 6.5 pounds of VOC per hour limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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**Comb**

**PTI A**

**Issued: 7/17/2003**

Emissions Unit ID: **K002**

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
3. The maximum annual coating usage shall not exceed 800 gallons per rolling, 12-month period. The permittee has existing records for this emissions unit, therefore a rolling, 12-month gallon usage table to monitor and restrict the first twelve months of usage is not necessary.
4. The maximum annual cleanup material usage shall not exceed 150 gallons per rolling, 12-month period. The permittee has existing records for this emissions unit, therefore a rolling, 12-month gallon usage table to monitor and restrict the first twelve months of usage is not necessary.
5. The maximum VOC content of any coating employed shall not exceed 6.5 pounds per gallon.
6. The maximum VOC content of the cleanup material employed shall not exceed 6.7 pounds per gallon.
7. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitation shall be based on a rolling, 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification of each coating employed;
  - b. the VOC content of each of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon;
  - c. the individual Hazardous Air Pollutant (HAP)<sup>1</sup> content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
  - d. the total combined HAP content for each HAP of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];

- e. the number of gallons of each coating employed;
- f. the rolling, 12-month summation of gallons of coating employed;
- g. the name and identification of each cleanup material employed;
- h. the VOC content of each of cleanup material, in pounds per gallon;
- i. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- j. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (i)];
- k. the number of gallons of each cleanup material employed;
- l. the number of gallons of each type of cleanup material drummed for shipment off-site.
- m. the rolling, 12-month summation of gallons of cleanup material employed;
- n. 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);
- o. the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [for each HAP the sum of (c) times (f) for each coating plus the sum of (i) times (m) for each cleanup material];
- p. the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [the sum of (d) times (f) for each coating plus the sum of (j) times (m) for each cleanup material]; and
- q. the total VOC emissions per a rolling, 12-month summation of the monthly emissions.

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of solvents contained in the coating or clean up materials. This information does not have to be kept on a line-by-line basis.

**Issued: 7/17/2003**

2. 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.
3. The permit to install for this emissions unit (K002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: N-Hexane

TLV (mg/m<sup>3</sup>): 176.2

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

MAGLC (ug/m<sup>3</sup>): 4196

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in

Emissions Unit ID: **K002**

an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the annual VOC emission limitation (3.1 tons per year) for this emissions unit (K002). This report shall be submitted to the Central District Office within 30 days after the deviation occurs.
2. The permittee shall notify the Central District Office in writing of any daily record showing that the dry filtration system was not in service when the 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 quarterly deviation (excursion) reports which:
  - a. identify any exceedances of the gallons per year restrictions for the coatings (800 gallons per rolling, 12-month period) and cleanup materials (150 gallons per rolling, 12-month period) employed;

- b. identify any exceedances of the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period;
  - c. identify any exceedances of the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period; and
  - d. identify any exceedances of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
4. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.2.
  5. The permittee shall submit deviation (excursion) reports which identify any exceedances of the VOC content limitations for the coatings (6.5 pounds per gallon) and cleanup materials (6.7 pounds per gallon) employed. These reports shall be submitted by January 31 of each year.
  6. The permittee shall also submit annual reports which specify the total VOC emissions from K001-K006 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
VOC emissions shall not exceed 6.5 lbs/hr, excluding cleanup.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by multiplying the maximum VOC content of 6.5 pounds per gallon by the maximum gallons used of 1.0 gallon per hour.
  - b. Emission Limitation:  
VOC emissions shall not exceed 3.1 tons/yr, including cleanup.  
  
Applicable Compliance Method:  
Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.n of this permit.

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**Issued**

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**Emissions Unit ID: K002**

- c. **Emission Limitation:**  
The total individual 9.9 HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
- Applicable Compliance Method:**  
Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.o of this permit..
- d. **Emission Limitation:**  
The total combined 24.9 HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.p of this permit.

- e. Emission Limitation:  
VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.q of this permit for each of the emissions units (K001-K006).

2. 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 an owner or operator determines that Method 24 of 40 CFR Part 60, Appendix A, 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.

**F. Miscellaneous Requirements**

1. The terms and conditions in this permit supersede those identified in permit 01-08697, issued on December 26, 2002.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Paint booth #3 with dry filtration system for the refinishing of motor vehicles	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 6.5 lbs/hr, excluding cleanup and 3.1 tons/yr, including cleanup. See A.2.a below.
	OAC rule 3745-35-07(B)	See B.1 through B.7 below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-35-07(B).
	OAC rule 3745-31-05(D)	VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(2)(c)	See B.3 thru B.6 below.  See B.7 below.  The VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

**2. Additional Terms and Conditions**

- 2.a The 6.5 pounds of VOC per hour limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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**Combs Collision**

**PTI Application: 01 08727**

**Issued**

**Facility ID: 0125232437**

**Emissions Unit ID: K003**

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
3. The maximum annual coating usage shall not exceed 800 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	200
1-2	400
1-3	600
1-4	800
1-5	800
1-6	800
1-7	800
1-8	800
1-9	800
1-10	800
1-11	800
1-12	800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

4. The maximum annual cleanup material usage shall not exceed 150 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	37.5
1-2	75
1-3	600
1-4	112.5
1-5	150
1-6	150
1-7	150
1-8	150
1-9	150
1-10	150
1-11	150
1-12	150

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup usage limitation shall be based upon a rolling, 12-month summation of the cleanup usage figures.

5. The maximum VOC content of any coating employed shall not exceed 6.5 pounds per gallon.
6. The maximum VOC content of the cleanup material employed shall not exceed 6.7 pounds per gallon.
7. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitation shall be based on a rolling, 12-month summation.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification of each coating employed;
  - b. the VOC content of each of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon;
  - c. the individual Hazardous Air Pollutant (HAP)<sup>1</sup> content for each HAP of each coating, in

- pounds of individual HAP per gallon of coating, as applied;
- d. the total combined HAP content for each HAP of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];
  - e. the number of gallons of each coating employed;
  - f. the rolling, 12-month summation of gallons of coating employed;
  - g. the name and identification of each cleanup material employed;
  - h. the VOC content of each of cleanup material, in pounds per gallon;
  - i. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
  - j. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (i)];
  - k. the number of gallons of each cleanup material employed;
  - l. the number of gallons of each type of cleanup material drummed for shipment off-site.
  - m. the rolling, 12-month summation of gallons of cleanup material employed;
  - n. 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);
  - o. the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [for each HAP the sum of (c) times (f) for each coating plus the sum of (i) times (m) for each cleanup material];
  - p. the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [the sum of (d) times (f) for each coating plus the sum of (j) times (m) for each cleanup material]; and
  - q. the total VOC emissions per a rolling, 12-month summation of the monthly emissions.

**Emissions Unit ID: K003**

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of solvents contained in the coating or clean up materials. This information does not have to be kept on a line-by-line basis.

2. 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.
3. The permit to install for this emissions unit (K003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: N-Hexane

TLV (mg/m<sup>3</sup>): 176.2

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

MAGLC (ug/m<sup>3</sup>): 4196

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the annual VOC emission limitation (3.1 tons per year) for this emissions unit (K003). This report shall be submitted to the Central District Office within 30 days after the deviation occurs.
2. The permittee shall notify the Central District Office in writing of any daily record showing that the dry filtration system was not in service when the 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 quarterly deviation (excursion) reports which:
  - a. identify any exceedances of the gallons per year restrictions for the coatings (800 gallons per rolling, 12-month period) and cleanup materials (150 gallons per rolling, 12-month period) employed;
  - b. identify any exceedances of the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period;
  - c. identify any exceedances of the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period; and
  - d. identify any exceedances of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
4. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.2.
5. The permittee shall submit deviation (excursion) reports which identify any exceedances of the VOC content limitations for the coatings (6.5 pounds per gallon) and cleanup materials (6.7 pounds per gallon) employed. These reports shall be submitted by January 31 of each year.
6. The permittee shall also submit annual reports which specify the total VOC emissions from K001-K006 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
VOC emissions shall not exceed 6.5 lbs/hr, excluding cleanup.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by multiplying the maximum VOC content of 6.5 pounds per gallon by the maximum gallons used of 1.0 gallon per hour.
  - b. Emission Limitation:  
VOC emissions shall not exceed 3.1 tons/yr, including cleanup.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.n of this permit.

- c. Emission Limitation:  
The total individual 9.9 HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.o of this permit..

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- d. Emission Limitation:  
The total combined 24.9 HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.p of this permit.

- e. Emission Limitation:  
VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.q of this permit for each of the emissions units (K001-K006).

2. 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 an owner or operator determines that Method 24 of 40 CFR Part 60, Appendix A, 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.

**F. Miscellaneous Requirements**

None

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Paint booth #4 with dry filtration system for the refinishing of motor vehicles	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 6.5 lbs/hr, excluding cleanup and 3.1 tons/yr, including cleanup. See A.2.a below.
	OAC rule 3745-35-07(B)	See B.1 through B.7 below.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-35-07(B).
	OAC rule 3745-31-05(D)	VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(2)(c)	See B.3 thru B.6 below.  See B.7 below.  The VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

### 2. Additional Terms and Conditions

- 2.a The 6.5 pounds of VOC per hour limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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**Comb**

**PTI A**

**Issued: 7/17/2003**

Emissions Unit ID: **K004**

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
3. The maximum annual coating usage shall not exceed 800 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	200
1-2	400
1-3	600
1-4	800
1-5	800
1-6	800
1-7	800
1-8	800
1-9	800
1-10	800
1-11	800
1-12	800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

4. The maximum annual cleanup material usage shall not exceed 150 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup usage levels specified in the following table:

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**PTI Application: 01 09727**  
**Issued**

**Facility ID: 0125232437**

Emissions Unit ID: **K004**

Month(s)	Maximum Allowable Cumulative Coating Usage
1	37.5
1-2	75
1-3	600
1-4	112.5
1-5	150
1-6	150
1-7	150
1-8	150
1-9	150
1-10	150
1-11	150
1-12	150

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup usage limitation shall be based upon a rolling, 12-month summation of the cleanup usage figures.

5. The maximum VOC content of any coating employed shall not exceed 6.5 pounds per gallon.
6. The maximum VOC content of the cleanup material employed shall not exceed 6.7 pounds per gallon.
7. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitation shall be based on a rolling, 12-month summation.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification of each coating employed;
  - b. the VOC content of each of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon;
  - c. the individual Hazardous Air Pollutant (HAP)<sup>1</sup> content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

- d. the total combined HAP content for each HAP of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];
- e. the number of gallons of each coating employed;
- f. the rolling, 12 month summation of gallons of coating employed;
- g. the name and identification of each cleanup material employed;
- h. the VOC content of each of cleanup material, in pounds per gallon;
- i. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- j. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (i)];
- k. the number of gallons of each cleanup material employed;
- l. the number of gallons of each type of cleanup material drummed for shipment off-site.
- m. the rolling, 12-month summation of gallons of cleanup material employed;
- n. 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);
- o. the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [for each HAP the sum of (c) times (f) for each coating plus the sum of (i) times (m) for each cleanup material];
- p. the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [the sum of (d) times (f) for each coating plus the sum of (j) times (m) for each cleanup material]; and
- q. the total VOC emissions per a rolling, 12-month summation of the monthly emissions.

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be

obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of solvents contained in the coating or clean up materials. This information does not have to be kept on a line-by-line basis.

2. 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.
3. The permit to install for this emissions unit (K004) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: N-Hexane

TLV (mg/m<sup>3</sup>): 176.2

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

MAGLC (ug/m<sup>3</sup>): 4196

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

Emissions Unit ID: **K004**

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the annual VOC emission limitation (3.1 tons per year) for this emissions unit (K004). This report shall be submitted to the Central District Office within 30 days after the deviation occurs.
2. The permittee shall notify the Central District Office in writing of any daily record showing that the dry filtration system was not in service when the 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 quarterly deviation (excursion) reports which:

- a. identify any exceedances of the gallons per year restrictions for the coatings (800 gallons per rolling, 12-month period) and cleanup materials (150 gallons per rolling, 12-month period) employed;
  - b. identify any exceedances of the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period;
  - c. identify any exceedances of the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period; and
  - d. identify any exceedances of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
4. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.2.
  5. The permittee shall submit deviation (excursion) reports which identify any exceedances of the VOC content limitations for the coatings (6.5 pounds per gallon) and cleanup materials (6.7 pounds per gallon) employed. These reports shall be submitted by January 31 of each year.
  6. The permittee shall also submit annual reports which specify the total VOC emissions from K001-K006 for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
 VOC emissions shall not exceed 6.5 lbs/hr, excluding cleanup.  
  
 Applicable Compliance Method:  
 Compliance shall be demonstrated by multiplying the maximum VOC content of 6.5 pounds per gallon by the maximum gallons used of 1.0 gallon per hour.
  - b. Emission Limitation:  
 VOC emissions shall not exceed 3.1 tons/yr, including cleanup.  
  
 Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.n of this permit.

- c. Emission Limitation:  
The total individual 9.9 HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.o of this permit..

- d. Emission Limitation:  
The total combined 24.9 HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.p of this permit.

- e. Emission Limitation:  
VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.q of this permit for each of the emissions units (K001-K006).

2. 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 an owner or operator determines that Method 24 of 40 CFR Part 60, Appendix A, 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.

**F. Miscellaneous Requirements**

None



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**Comb**

**PTI A**

**Issued: 7/17/2003**

Emissions Unit ID: **K005**

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
3. The maximum annual coating usage shall not exceed 800 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	200
1-2	400
1-3	600
1-4	800
1-5	800
1-6	800
1-7	800
1-8	800
1-9	800
1-10	800
1-11	800
1-12	800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

4. The maximum annual cleanup material usage shall not exceed 150 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	37.5
1-2	75
1-3	600
1-4	112.5
1-5	150
1-6	150
1-7	150
1-8	150
1-9	150
1-10	150
1-11	150
1-12	150

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup usage limitation shall be based upon a rolling, 12-month summation of the cleanup usage figures.

5. The maximum VOC content of any coating employed shall not exceed 6.5 pounds per gallon.
6. The maximum VOC content of the cleanup material employed shall not exceed 6.7 pounds per gallon.
7. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitation shall be based on a rolling, 12-month summation.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification of each coating employed;
  - b. the VOC content of each of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon;
  - c. the individual Hazardous Air Pollutant (HAP)<sup>1</sup> content for each HAP of each coating, in

pounds of individual HAP per gallon of coating, as applied;

- d. the total combined HAP content for each HAP of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];
- e. the number of gallons of each coating employed;
- f. the rolling, 12-month summation of gallons of coating employed;
- g. the name and identification of each cleanup material employed;
- h. the VOC content of each of cleanup material, in pounds per gallon;
- i. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- j. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (i)];
- k. the number of gallons of each cleanup material employed;
- l. the number of gallons of each type of cleanup material drummed for shipment off-site.
- m. the rolling, 12-month summation of gallons of cleanup material employed;
- n. 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);
- o. the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [for each HAP the sum of (c) times (f) for each coating plus the sum of (i) times (m) for each cleanup material];
- p. the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [the sum of (d) times (f) for each coating plus the sum of (j) times (m) for each cleanup material]; and
- q. the total VOC emissions per a rolling, 12-month summation of the monthly emissions.

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be

obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of solvents contained in the coating or clean up materials. This information does not have to be kept on a line-by-line basis.

2. 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.
3. The permit to install for this emissions unit (K005) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: N-Hexane

TLV (mg/m<sup>3</sup>): 176.2

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

MAGLC (ug/m<sup>3</sup>): 4196

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

Emissions Unit ID: **K005**

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the annual VOC emission limitation (3.1 tons per year) for this emissions unit (K005). This report shall be submitted to the Central District Office within 30 days after the deviation occurs.
2. The permittee shall notify the Central District Office in writing of any daily record showing that the dry filtration system was not in service when the 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 quarterly deviation (excursion) reports which:

- a. identify any exceedances of the gallons per year restrictions for the coatings (800 gallons per rolling, 12-month period) and cleanup materials (150 gallons per rolling, 12-month period) employed;
  - b. identify any exceedances of the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period;
  - c. identify any exceedances of the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period; and
  - d. identify any exceedances of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
4. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.2.
  5. The permittee shall submit deviation (excursion) reports which identify any exceedances of the VOC content limitations for the coatings (6.5 pounds per gallon) and cleanup materials (6.7 pounds per gallon) employed. These reports shall be submitted by January 31 of each year.
  6. The permittee shall also submit annual reports which specify the total VOC emissions from K001-K006 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
VOC emissions shall not exceed 6.5 lbs/hr, excluding cleanup.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by multiplying the maximum VOC content of 6.5 pounds per gallon by the maximum gallons used of 1.0 gallon per hour.
  - b. Emission Limitation:  
VOC emissions shall not exceed 3.1 tons/yr, including cleanup.

**Combs Collision****PTI Application: 01 00727****Issued****Facility ID: 0125232437**Emissions Unit ID: **K005**

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.n of this permit.

c. Emission Limitation:

The total individual 9.9 HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.o of this permit..

- d. Emission Limitation:  
The total combined 24.9 HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.p of this permit.

- e. Emission Limitation:  
VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.q of this permit for each of the emissions units (K001-K006).

2. 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 an owner or operator determines that Method 24 of 40 CFR Part 60, Appendix A, 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.

**F. Miscellaneous Requirements**

None

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Paint booth #6 with dry filtration system for the refinishing of motor vehicles	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 6.5 lbs/hr, excluding cleanup and 3.1 tons/yr, including cleanup. See A.2.a below.
		See B.1 through B.7 below.
	OAC rule 3745-35-07(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-35-07(B).
	OAC rule 3745-31-05(D)	VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per a rolling, 12-month summation.
	OAC rule 3745-21-09(U)(2)(c)	See B.3 thru B.6 below.
		See B.7 below.
		The VOC content limit requirements of OAC rule 3745-21-09(U)(1) do not apply.

### 2. Additional Terms and Conditions

- 2.a The 6.5 pounds of VOC per hour limitation for this emissions unit was established to reflect the hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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**Comb**

**PTI A**

**Issued: 7/17/2003**

Emissions Unit ID: **K006**

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. The permittee shall maintain a minimum stack height of 30 feet aboveground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.
3. The maximum annual coating usage shall not exceed 800 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	200
1-2	400
1-3	600
1-4	800
1-5	800
1-6	800
1-7	800
1-8	800
1-9	800
1-10	800
1-11	800
1-12	800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

4. The maximum annual cleanup material usage shall not exceed 150 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup usage levels specified in the following table:

**Combs Collision**  
**PTI Application: 01 09727**  
**Issued**

**Facility ID: 0125232437**

Emissions Unit ID: **K006**

Month(s)	Maximum Allowable Cumulative Coating Usage
1	37.5
1-2	75
1-3	600
1-4	112.5
1-5	150
1-6	150
1-7	150
1-8	150
1-9	150
1-10	150
1-11	150
1-12	150

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup usage limitation shall be based upon a rolling, 12-month summation of the cleanup usage figures.

5. The maximum VOC content of any coating employed shall not exceed 6.5 pounds per gallon.
6. The maximum VOC content of the cleanup material employed shall not exceed 6.7 pounds per gallon.
7. The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitation shall be based on a rolling, 12-month summation.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification of each coating employed;
  - b. the VOC content of each of coating employed (excluding water and exempt solvents), as applied, in pounds per gallon;
  - c. the individual Hazardous Air Pollutant (HAP)<sup>1</sup> content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

- d. the total combined HAP content for each HAP of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];
- e. the number of gallons of each coating employed;
- f. the rolling, 12-month summation of gallons of coating employed;
- g. the name and identification of each cleanup material employed;
- h. the VOC content of each of cleanup material, in pounds per gallon;
- i. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- j. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (i)];
- k. the number of gallons of each cleanup material employed;
- l. the number of gallons of each type of cleanup material drummed for shipment off-site.
- m. the rolling, 12-month summation of gallons of cleanup material employed;
- n. 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);
- o. the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [for each HAP the sum of (c) times (f) for each coating plus the sum of (i) times (m) for each cleanup material];
- p. the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period [the sum of (d) times (f) for each coating plus the sum of (j) times (m) for each cleanup material]; and
- q. the total VOC emissions per a rolling, 12-month summation of the monthly emissions.

<sup>1</sup> A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be

**Combs Collision**

PTI Application: 01 09727

**Issued**

Facility ID: 0125232437

Emissions Unit ID: **K006**

obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of solvents contained in the coating or clean up materials. This information does not have to be kept on a line-by-line basis.

2. 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.
3. The permit to install for this emissions unit (K006) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: N-Hexane

TLV (mg/m<sup>3</sup>): 176.2

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

MAGLC (ug/m<sup>3</sup>): 4196

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 6.5

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 707.3

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

(ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the annual VOC emission limitation (3.1 tons per year) for this emissions unit (K006). This report shall be submitted to the Central District Office within 30 days after the deviation occurs.
- 2. The permittee shall notify the Central District Office in writing of any daily record showing that the dry filtration system was not in service when the 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 quarterly deviation (excursion) reports which:

- a. identify any exceedances of the gallons per year restrictions for the coatings (800 gallons per rolling, 12-month period) and cleanup materials (150 gallons per rolling, 12-month period) employed;
  - b. identify any exceedances of the total individual HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period;
  - c. identify any exceedances of the total combined HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period; and
  - d. identify any exceedances of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
4. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.2.
  5. The permittee shall submit deviation (excursion) reports which identify any exceedances of the VOC content limitations for the coatings (6.5 pounds per gallon) and cleanup materials (6.7 pounds per gallon) employed. These reports shall be submitted by January 31 of each year.
  6. The permittee shall also submit annual reports which specify the total VOC emissions from K001-K006 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
VOC emissions shall not exceed 6.5 lbs/hr, excluding cleanup.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by multiplying the maximum VOC content of 6.5 pounds per gallon by the maximum gallons used of 1.0 gallon per hour.
  - b. Emission Limitation:  
VOC emissions shall not exceed 3.1 tons/yr, including cleanup.  
  
Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.n of this permit.

- c. Emission Limitation:  
The total individual 9.9 HAP for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.o of this permit..

- d. Emission Limitation:  
The total combined 24.9 HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limitation shall be determined by the record keeping requirements specified in Section C.1.p of this permit.

- e. Emission Limitation:  
VOC emissions from emission units K001-K006 shall not exceed 18.6 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by summing the monthly VOC emissions per the record keeping requirements specified in Section C.1.q of this permit for each of the emissions units (K001-K006).

2. 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 an owner or operator determines that Method 24 of 40 CFR Part 60, Appendix A, 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.

**F. Miscellaneous Requirements**

None