



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/8/2011

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

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

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: CDAQ

Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	1318378453
Facility Name:	SUBURBAN COLLISION CENTER
Facility Description:	Auto body shop.
Facility Address:	26618 BROOKPARK RD NORTH OLMSTED, OH 44070 Cuyahoga County
Permit #:	P0095664, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Plain Dealer on 09/10/2008. The comment period ended on 03/06/2009.	
Hearing date (if held)	03/03/2009
Hearing Public Notice Date (if different from draft public notice)	01/30/2009

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Request for Public Hearing

- a. Comment: Commenters expressed concern over the installation of emissions units (spray booths) at the facility. They claim that the facility has caused an odor nuisance in the housing development downwind of the facility that has led to the increased difficulty of enjoyment of their property due to the strong odors of paint coming from the facility.

As a result of this expressed concern, residents have requested a public hearing be held to address the matter of odor nuisances, possible health concerns and to discuss the draft issuance of a federally enforceable permit-to-install and operate (PTIO) to the facility by the Ohio EPA.

- b. Response: The Ohio EPA/Cleveland Division of Air Quality (CDAQ) held a public meeting and a hearing on March 3, 2009, to help stakeholders understand the technical aspects and environmental impacts of the installation of the emissions units at the facility. Public notice for the meeting and hearing was given on January 30, 2009.

2. Topic: Diminished Quality of Life

- a. Comment: Commenters expressed concern that the quality of life has diminished since the facility increased the amount of painting conducted at their North Olmsted facility.

The commenters also stated that many hearings have been held regarding this issue and that the City of North Olmsted has ignored Pine Ridge residents' concerns by granting the facility permission to increase the release of potentially harmful paint fumes into the atmosphere. The commenters also stated that the facility has fallen short on their promises that their state-of-the-art booth would avoid these dangerous and harmful fumes.

- b. Response: It is the mission of the Ohio EPA/CDAQ, to enforce all applicable state and federal environmental regulations and ensure that regulated facilities maintain compliance to protect human health and the environment. The draft permit contains terms and conditions that require compliance with these regulations.

Ohio EPA/CDAQ does not have the legal authority to enforce local zoning ordinances developed by municipalities to protect quality of life or violations thereof.

3. Topic: Citizen Request for Denial of Operating Permit

- a. Comment: A commenter expressed concern that since the original installation, their lifestyle has been adversely affected. There is an intermittent strong smell of paint fumes throughout the day all times of the year that may last up to 30 minutes and then go away for 30 minutes, but it always comes back. The commenter went on to state that in their opinion there has been no improvement with the installation of the two new booths and requests that the facility's request for an operating permit be denied.

- b. Response: Air pollution regulations are developed to protect both human health and the environment. The requirements in these regulations are then incorporated into permits issued by Ohio EPA.

If issues other than those related to the current Permit to Install/Operate (PTIO) terms and conditions that are not subject to state or federal regulations arise, citizens should contact their local government. Concerns that an activity (already compliant with state and federal regulations) may negatively affect quality of life standards should be addressed through the appropriate local means.

4. Topic: Concern Over Odor and Exposure to Possible Health Risks

- a. Comment: A commenter expressed concern over whether or not the odors are a health risk for citizens and that the City of North Olmsted has a nuisance odor ordinance and would appreciate some assistance with enforcing this ordinance.

The commenter went on to request that Ohio EPA/CDAQ help the city as much as possible in trying to determine if this permit should be allowed on the basis of what has been submitted.

- b. Response: While the Ohio EPA/CDAQ does not have the legal authority to enforce the ordinances of local municipalities, assistance is routinely offered to local governments on the development of local solutions to local air quality concerns.

The facility has undergone the necessary pollutant modeling tests required by the Ohio EPA for determining ground level pollutant concentrations. According to the data rendered from that testing, the levels of pollutant concentration associated with this emissions unit do not exceed levels that

are considered to be hazardous to human health and welfare. Noticeable odors may be considered a nuisance, but not necessarily a primary health threat. Based on information submitted, data, calculations and pollution modeling, the facility has satisfied the requirements of all applicable state and federal air pollution regulations.

5. Topic: Noise Pollution

a. Comment: A commenter expressed interest in wanting to know if the Ohio EPA/CDAQ has the authority to regulate noise pollution levels associated with the air exhaust system installed at the facility.

b. Response: The Ohio EPA does not have oversight of noise pollution allegations. Noise concerns are typically addressed through local ordinances.

6. Topic: Late Report Submittal

a. Comment: A commenter inquired if there is any significance with the late submittal of air pollution reports from the facility and how Ohio EPA/CDAQ defines late submittal of an air pollution report.

b. Response: When a facility is required to submit reports to identify deviations or equipment malfunctions that may have occurred, a series of steps are followed to conduct the review of any given report.

The first step is to determine whether a deviation from any permit requirement has occurred. Ohio EPA/CDAQ is responsible for reviewing facility records and reports to ensure compliance with permit terms and conditions. However, if a facility is aware that a deviation has occurred, that facility is required by law through the permit to report the deviation.

The second step of reviewing a report is to examine the duration of any known reported deviations and whether or not the facility has corrected the problem or continued to operate without rectifying the issue.

The third step is to review the timeliness of report submittal. All facilities are on specific report submittal schedules. If a facility has a history of late report submittals, a Notice of Violation (NOV) may be warranted. This is, in most cases, a minor offense, and issuance of an NOV for such an offense is usually left to the discretion of the agency (inspector) on a case by case basis.

The late submittal (or non-submittal) of a required report is a violation of the facility's permit and or an Ohio Administrative Code (OAC) rule. When a facility receives a notice of violation in this regard, it requires them to submit any missing reports, and to provide a corrective action plan with measures they will take to ensure future reports are submitted on time.

Ohio EPA/CDAQ deems to be late any report received after its due date. Consideration may be given to the potential for mail delays if a report is a few days late. In certain areas (e.g. Risk Management Plans, Toxic Chemical Release Forms) the Ohio EPA Air Pollution Regulations specify a late filing fee for submittals more than 30 days after the prescribed filing date.

7. Topic: Alleged Mischaracterization of Facility

a. Comment: Commenters are concerned about the alleged mischaracterizations of the facility and its ownership as alleged by the City of North Olmsted's Law Department.

b. Response: Ohio EPA/CDAQ can only address comments pertaining to state and federal



environmental regulations and environmental health concerns. Counter arguments (rebuttal) related to the comments made by another commenter should be addressed directly to the entity commenting.

8. Topic: Respondent Submitted by the City of North Olmsted
 - a. Comment: Submission of Respondent by the City of North Olmsted: Summary of Zoning Administration and Odor Nuisance and Written Comment for Public Hearing; Exhibit A: consisting of an event log of thirteen complaints (four (4) regarding paint or paint odors, six (6) regarding property maintenance, two (2) regarding noise, and one (1) building violation); record log of inspections conducted by city inspectors; phone call log containing 124 complaints regarding paint odors, and five (5) North Olmsted Police Department incident reports (Report Nos. 08-03076, 08-09069, 08-13587, 08-21058 and 08-21055) each citing violation of City Building Code 7194.
 - b. Response: There are many factors that play a role in detecting air pollution problems. If a citizen has a complaint or witnesses an incident that he or she believes to be an air pollution issue requiring the involvement of Ohio EPA/CDAQ, the resident should report the problem as soon as possible.

Reporting an incident may be done by contacting the CDAQ directly at (216) 664-2297 (during normal business hours), the CDAQ Complaint Hotline (216) 441-7442 if the incident occurs outside of normal business hours, or online at the following web link:
<http://www.clevelandhealth.org/AirQuality/AirQualityComplaints.html>

Citizens may also contact the City of Cleveland's Mayor's Action Center online at:
<http://portal.cleveland.oh.gov/portal/page/portal/CityofCleveland/Home/contact/mayor>

Complaints are investigated within five working days of being received. In some instances, depending on the nature, severity or complaint history, a complaint may be investigated as expeditiously as possible.

The complaint/incident report should include as many supporting details as possible that may be helpful in determining the source of the perceived problem. Information to include in the complaint/incident report would be the time of day, weather conditions, duration, intensity, and the citizen's location during the incident.

9. Topic: Addition of New Regulations to Renewal Draft Permit
Note: During the time between draft issuance of the renewal permit and the pending final issuance, a new Ohio Administrative Code rule OAC rule was promulgated. OAC rule 3745-21-18 establishes reasonably available control technology (RACT) requirements for commercial motor vehicle and mobile equipment refinishing. This rule applies to all motor vehicle and mobile equipment refinishing operations located within Cuyahoga County, regardless of the unit's installation and permit issuance dates. Thus, the requirements of OAC rule 3745-21-18 have been incorporated into the renewal permit

Ohio

**Environmental
Protection Agency**

FINAL

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

Facility ID:	1318378453
Permit Number:	P0095664
Permit Type:	Renewal
Issued:	3/8/2011
Effective:	3/8/2011
Expiration:	3/8/2016



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

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 5
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 12
1. Emissions Unit Group - Two Paint Spray Booths: K001, K002, 13

Authorization

Facility ID: 1318378453
Application Number(s): A0027248
Permit Number: P0095664
Permit Description: Renewal FEPTIO for two automotive spraypaint booths with exempt air heaters (K001 and K002). PTI 13-04598 issued 3/28/2006.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/8/2011
Effective Date: 3/8/2011
Expiration Date: 3/8/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SUBURBAN COLLISION CENTER
26618 BROOKPARK RD
NORTH OLMSTED, OH 44070

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

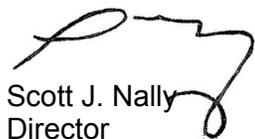
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0095664
Permit Description: Renewal FEPTIO for two automotive spraypaint booths with exempt air heaters (K001 and K002). PTI 13-04598 issued 3/28/2006.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Two Paint Spray Booths

Emissions Unit ID:	K001
Company Equipment ID:	SPRAY PAINT BOOTH
Superseded Permit Number:	13-04598
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	SPRAY PAINT BOOTH
Superseded Permit Number:	13-04598
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-

15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3, 4, and 5.

2. Applicable Emissions Limitations and/or Control Requirements

- a) The following emissions limitations and/or control measures apply to emissions units K001, K002 and K003. Emissions from these units shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
(1)	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and MACT, subpart MMMM	See 2.b)(1).

b) Additional Terms and Conditions

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

3. Monitoring and/or Recordkeeping Requirements

- a) The permittee shall collect and record the following information each month for the entire facility (includes emissions units K001, K002 and K003):
 - (1) the name and identification number of each HAP containing material employed;
 - (2) the individual HAP content for each HAP, in pounds of individual HAP per pound of material;
 - (3) the total combined HAP content, in pounds of combined HAPs per pound of material [sum all the individual HAP contents from (2)];
 - (4) the number of pounds of each HAP containing material employed;
 - (5) the total individual HAP usage for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (2) times (4) for each material];

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

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

4. Reporting Requirements

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

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

5. Testing Requirements

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

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

Applicable Compliance Method

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

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

Applicable Compliance Method

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

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Two Paint Spray Booths: K001, K002,

EU ID	Operations, Property and/or Equipment Description
K001	Automotive paint spray booth with exempt air heater
K002	Automotive paint spray booth with exempt air heater

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

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

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

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

a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	7.34 tpy VOC (including clean-up) 36.6 lbs VOC /day.
b.	OAC rule 3745-21-09(U)(1)	Not applicable, pursuant to OAC rule 3745-21-09(U)(2)(c).
c.	OAC rule 3745-21-18	See Section c) and Section e)(4) and (5).
d.	OAC rule 3745-17-11(C)	See (2)a.

(2) Additional Terms and Conditions

a. The permittee shall operate the dry exhaust filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the

permittee. The dry exhaust filtration system shall be employed during all periods of coating application to control particulate emissions.

c) Operational Restrictions

- (1) The permittee shall not apply to mobile equipment or mobile equipment components any automotive pretreatment, automotive primer-surfacer, automotive primer-sealer, automotive topcoat, or automotive specialty coatings, including any VOC-containing materials added to the original coating supplied by the manufacturer, that contain VOCs in excess of the limits specified in the following table*:

*Table: Allowable content of VOCs in mobile equipment repair and refinishing coatings, as applied (in weight of VOC per volume of coating, excluding water and non-VOC or exempt solvents)

Coating Type	Limit (pounds VOC per gallon of coating, excluding water and exempt solvents)	Limit (grams VOC per liter of coating, excluding water and exempt solvents)
pretreatment primer	6.5	780
primer-surfacer	4.8	575
primer-sealer	4.6	550
topcoat(single-stage)	5.0	600
topcoat (two-stage basecoat/clearcoat)	5.0	600
topcoat (three or four-stage basecoat/clearcoat)	5.2	625
multi-colored topcoat	5.7	680
automotive specialty	7.0	840

- (2) The permittee shall calculate the VOC content of the coatings employed in accordance with the following equation:
- a. Except for multi-stage topcoats, the mass of VOC per combined volume of VOC and coating solids, excluding water and exempt solvents, shall be calculated by the following equation:

Where:

VOC = VOC content in pounds per gallon of coating, excluding water and exempt solvents;

Vv = mass of total volatiles, in pounds;

Ww = mass of water, in pounds;

Wec = mass of exempt solvents, in pounds;

V = volume of coating, in gallons;

Vw = volume of water, in gallons; and

Vec = volume of exempt solvents, in gallons.

- (3) The permittee shall calculate the VOC content of a multi-stage topcoat by using the following equation:

$$VOC_{multi} = \frac{VOC_{bc} + \sum_{i=0}^M VOC_{mci} + 2(VOC_{cc})}{M + 3}$$

where:

VOC_{multi} = VOC content of multistage topcoat, in pounds per gallon, excluding water and exempt solvents;

VOC_{bc} = VOC content of basecoat, in pounds per gallon, excluding water and exempt solvents;

VOC_{mci} = VOC content of each midcoat(s), in pounds per gallon, excluding water and exempt solvents;

VOC_{cc} = VOC content of the clear coat, in pounds per gallon, excluding water and exempt solvents; and

M = number of midcoats.

(The VOC content of each coating shall be measured in accordance with USEPA method 24.)

- (4) The permittee shall use one or more of the following application techniques, in accordance with manufacturer's specifications, to apply any coating containing a VOC as a pretreatment, primer, sealant, basecoat, clear coat, or topcoat to mobile equipment for commercial purposes:
- a. Flow or curtain coating;
 - b. Dip coating;
 - c. Roller coating;
 - d. Brush coating;

- e. Cotton-tipped swab application;
 - f. Electro-deposition coating;
 - g. HVLP spraying;
 - h. Electrostatic spray;
 - i. Airless spray;
 - j. Air-assisted airless spray; and
 - k. Any other coating application method that the owner or operator of the facility demonstrates and Ohio environmental protection agency determines achieves emission reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio environmental protection agency. Any equivalent coating application method approved by the director shall be submitted to the USEPA as a revision to the Ohio state implementation plan for ozone.
- (5) The permittee shall properly train all employees who engage in the use of an HVLP sprayer, or equivalent application, in accordance with manufacturer's specifications, and in the handling of a coating and any solvents used to clean the sprayer.
- (6) The permittee shall ensure that the spray guns used to apply mobile equipment repair and refinishing coatings shall be cleaned by one of the following:
- a. An enclosed spray gun cleaning system that is kept closed when not in use;
 - b. Un-atomized discharge of solvent into a paint waste container that is kept closed when not in use;
 - c. Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; and
 - d. Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.
- (7) The permittee shall store the following materials in nonabsorbent, non-leaking containers and keep these containers closed at all times when not in use:
- a. Fresh coatings;
 - b. Used coatings;
 - c. Solvents;
 - d. VOC-containing additives and materials;
 - e. VOC-containing waste materials; and
 - f. Cloth, paper, or absorbent applicators moistened with any of the items listed in this subsection.

d) Monitoring and/or Recordkeeping Requirements

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

The permittee shall document each inspection of the dry exhaust filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These

records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

In the event that the dry exhaust filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry exhaust filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the dry exhaust filtration system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., X hours per day and Y days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Pollutant: Xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 1.64

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

MAGLC (g/m³): 10337.91

Pollutant: Methyl n-amyl ketone

TLV (mg/m³): 233.50

Maximum Hourly Emission Rate (lbs/hr): 0.82

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

MAGLC (g/m³): 5559.52

Pollutant: n-Butyl acetate

TLV (mg/m³): 712.64

Maximum Hourly Emission Rate (lbs/hr): 2.33

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

MAGLC (g/m³): 16967.62

The permittee, has demonstrated that emissions of the above listed toxic contaminants from emissions unit K001 and K002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (2) The permittee shall include in the permit evaluation report any record of the date and length of time the dry exhaust filtration system was not in service during coating application. The permit evaluation report shall be submitted annually, at a minimum, to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.
 - (3) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
 - (4) The permittee shall submit documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings required in this rule are in use at their facility. The documentation also shall verify that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the sprayer. This documentation shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency. In addition, the owner or operator shall retain the documentation on site and make the documentation available to the appropriate Ohio environmental protection agency district office or local air agency upon request. The documentation shall be submitted by:
 - a. No later than one year after the effective date of this rule (04/02/09) for sources covered under paragraph (A)(2) of this rule.
 - (5) The permittee shall maintain records for a period of five years of the amount and VOC content of each coating employed and report to the director all emissions in excess of the limits specified in the table of this rule within forty-five days after each exceedance is discovered.
 - (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
7.34 tpy VOC (including clean-up)

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



- b. Emission Limitation
36.6 lbs VOC/day

Applicable Compliance Method

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

- g) Miscellaneous Requirements

- (1) None.