



Environmental Protection Agency

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

8/19/2011

Jack Leet
Voss Collision Centre
94 Loop Rd
Centerville, OH 45459

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0857023235

Permit Number: P0107724

Permit Type: Renewal

County: Montgomery

Certified Mail

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

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 Regional Air Pollution Control Agency at (937)225-4435 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: RAPCA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Voss Collision Centre**

Facility ID:	0857023235
Permit Number:	P0107724
Permit Type:	Renewal
Issued:	8/19/2011
Effective:	8/19/2011
Expiration:	8/19/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
Voss Collision Centre

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
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 10
1. Emissions Unit Group -Misc. Metal Parts Paint Booths: K001,K002,K003,K004,K005,K006, 11

Authorization

Facility ID: 0857023235
Application Number(s): A0041398, A0042142
Permit Number: P0107724
Permit Description: PTIO Renewal permit for six miscellaneous metal parts booths - Auto and Truck Repair, emissions units K001 - K006. Facility transitioning from synthetic minor to non-Title V.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 8/19/2011
Effective Date: 8/19/2011
Expiration Date: 8/19/2021
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Voss Collision Centre
90 Loop Rd
Centerville, OH 45459

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

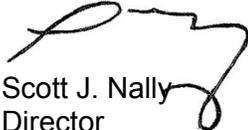
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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: P0107724
Permit Description: PTIO Renewal permit for six miscellaneous metal parts booths - Auto and Truck Repair, emissions units K001 - K006. Facility transitioning from synthetic minor to non-Title V.

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

Group Name: Misc. Metal Parts Paint Booths

Emissions Unit ID:	K001
Company Equipment ID:	Metal Parts Booth No. 1
Superseded Permit Number:	08-04466
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Metal Parts Booth No. 2
Superseded Permit Number:	08-04466
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Metal Parts Booth No. 3
Superseded Permit Number:	08-04466
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Metal Parts Booth No. 4
Superseded Permit Number:	08-04466
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Metal Parts Booth No. 5
Superseded Permit Number:	08-04466
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	Metal Parts Booth No. 6
Superseded Permit Number:	08-04466
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 Regional Air Pollution Control Agency 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.

¹Permittees 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).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, promulgated on 1/9/2008. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Misc. Metal Parts Paint Booths: K001,K002,K003,K004,K005,K006,

Table with 2 columns: EU ID and Operations, Property and/or Equipment Description. Rows include K001 through K006, each describing a spray paint booth with dry exhaust filters installed prior to August 3, 2006.

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. b)(1)e., d)(8) thorough d)(11), and e)(3).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 'a' lists OAC rule 3745-31-05(A)(3) and details VOC emission limits for units K001-K003 and K004-K006.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements established pursuant to this rule also include compliance with the requirements of OAC rules 3745-17-11(C) and 3745-21-18.
b.	OAC rule 3745-21-18	See b)(2)b. and c)(1) through c)(4) and e)(5).
c.	OAC rule 3745-17-11(C)	The particulate emissions from this emissions unit shall be controlled by a dry particulate filter, water wash, orequivalent control device or devices. See c)(5)below. See c)(5), c)(6) and d)(3) through d)(7).
d.	OAC rule 3745-21-09(U)(1)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-09(U)(2)(c).
e.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(8) thorough d)(11) and e)(3).

(2) Additional Terms and Conditions

- a. The hourly VOC emissions limitations for these emissions units were established for PTIO purposes to reflect the potential to emit for each emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- b. 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 table below. The VOC content of the coatings employed shall be determined in accordance with in OAC rule 3745-17-11(C)(2).

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

c) Operational Restrictions

- (1) 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. high volume, low pressure (HVLP) spraying;
 - h. electrostatic spray;
 - i. airless spray;
 - j. air-assisted airless spray; and
 - k. Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the Director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone.
- (2) The permittee shall ensure that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, in accordance with manufacturer's specifications, and the handling of a coating and any solvents used to clean the sprayer.
- (3) 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.
 - (4) 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 c)(4)a through c)(4)e above.
 - (5) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
 - (6) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain records for a period of five years of the amount and VOC content of each coating employed.
 - (2) The permittee shall maintain monthly records which list the following information for each VOC-containing material (coatings, thinners, reducers, surfacers, clean-up solvents, etc.) used or purchased by the facility in each calendar year:
 - a. The name and identification number of each material.
 - b. The quantity of each material used or purchased, in gallons.
 - c. The VOC content of each material, in pounds per gallon.
 - d. The name and identification of each cleanup material employed.
 - e. The quantity of each cleanup material employed, in gallons.
 - f. The quantity of each cleanup material drummed for shipment off-site, in gallons.

- g. The VOC content of each cleanup material, in pounds per gallon.
- h. The total VOC emissions from materials employed, in tons/month {i.e., the summation of the products of d)(2)b. x d)(2)c. for each material plus the sum of the products of [d)(2)e.-d)(2)f)] x d)(2)g. for each cleanup material}.

The annual VOC emissions shall be determined by summing the total monthly emissions.

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. 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 particulate filter 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 or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of 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.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (8) The PTIO application for these emissions units, K001 – K006, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F),

was applied to this/these emissions units 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 contaminants 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 results 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 units, (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 units, i.e., "X" = 24 hours per day and "Y" = 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- 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):

Toxic Contaminant: toluene

TLV (mg/m³): 188.41

Maximum Hourly Emission Rate (lbs/hr): 3.01

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³):1149.88

MAGLC (ug/m³):4,486

The permittee, has demonstrated that emissions of toluene, from emissions units K001 – K006, 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).

- (9) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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 PTIO 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.

- (10) 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.
 - (11) 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) The permittee shall submit a written report to the Director that includes all exceedances of the allowable VOC content of each material employed in this emissions unit. The report shall be submitted to the Director within forty-five days after each exceedance is discovered.
 - (2) 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.
 - (3) The permittee shall include 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, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (4) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
 - (5) Each owner or operator subject to the provisions of OAC rule 3745-21-18 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. In accordance with paragraph (A)(1)(b) of this rule, the documentation shall be submitted by June 10, 2006.

f) Testing Requirements

(1) Compliance with the usage restrictions and emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC emissions from each emissions unit shall not be the following:

K001 – K003: 2.06 pounds per hour per unit, excluding cleanup materials.

K004 – K006: 1.28 pounds per hour per unit, excluding cleanup materials.

Applicable Compliance Method:

K001 – K003: The hourly VOC limitation was determined by a VOC emissions model prepared by the permittee to reflect the potential to emit for this unit. The model was set up as a highest emissions scenario and modeled as painting a complete vehicle using all the coating components for refinishing.

K004 – K006: The hourly VOC limitation was determined by a VOC emissions model prepared by the permittee to reflect the potential to emit for this unit. The model was set up as a highest emissions scenario and modeled as though painting 3 panels, using the capacity of the stall.

These limitations were established for PTIO purposes to reflect the potential to emit for this unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

b. Emission Limitation:

The VOC emissions from each emissions unit shall not exceed the following:

K001 – K003: 9.36 tons/year per unit, including cleanup.

K004 – K006: 5.95 tons/year per unit, including cleanup.

Applicable Compliance Method:

The annual VOC emissions limitation for each emissions unit was determined by multiplying the hourly emissions limitation by 8760 hours/year, dividing by 2000 lbs/ton, and adding the maximum emissions from cleanup materials (0.34 tons/year).

Compliance with the annual emissions limitations shall be based upon the record keeping as specified in section d)(2) and shall be the sum of the twelve monthly VOC emission rates for the calendar year.

- g) Miscellaneous Requirements
 - (1) None.