

1

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code

2

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

(OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

3

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

4

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

5

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Dodds Body Works Inc** located in **Franklin** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K002	Paint spray booth	Compliance with permitted limits and terms and conditions contained within this permit along with compliance with the Air Toxics Policy and use of filters with 96.5 percent control efficiency.	3745-31-05 3745-21-09 (U) (2) (c) 3745-17-11 3745-17-07	0.51 pound PM/hour, 0.223 ton PM/year; 8.25 pounds VOC/hour, 3.79 tons VOC/year; Use of no greater than 86.5 gallons/month; See Additional Special Terms and Conditions.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	3.79
PM	0.223

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Oho EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

7

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

K002 - Paint Spray Booth, Mix Area, and Prep Room

A. Operational Requirements

1. Source K002 shall not employ more than 86.5 gallons per month.
2. Source K002 shall not employ any coatings with a VOC content greater than 7.3 pounds VOC/gallon.
3. Source K002 shall use filters for particulate control with 96.5 percent control efficiency or better at all times source is in operation.

B. Monitoring and Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for source K002:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating employed; and,

8

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

- d. the total VOC emissions from all coatings employed, in pounds or tons per month.

C. Reporting Requirements

1. The permittee shall notify the Director of any monthly record showing the exceedance of a permitted usage and/or

emissions limit. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.

2. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five (5) years from the date the record was created.

D. Testing Requirements

1. Compliance with the emission limitation(s) in these Additional Special Terms and Conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

8.25 pounds VOC/hour

Applicable Compliance Method

Take the monthly total pound VOC/month emitted and divide by the number of hours in the month.

- b. Emission Limitation

3.79 tons VOC/year

Applicable Compliance Method

Multiply the maximum VOC content of 7.3 pounds/gallon by the number of gallons used and divide by 2000 pounds/ton.

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

c. Emission Limitation

Use of 86.5 gallons of coating per month

Applicable Compliance Method

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for all coatings if, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation

0.51 pound PM/hour

Applicable Compliance Method

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$

$E = \text{particulate matter emissions rate (pounds/hour)}$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (62.5 percent for HVLP spray guns)

CE = control efficiency of the control equipment (95 percent for baghouse)

e. Emission Limitation

10

Facility Name: **Dodds Body Works Inc**

Application Number: **01-7394**

Date: **June 17, 1998**

0.223 ton PM/year

Applicable Compliance Method

Multiply the pound/hour emission rate of 0.551 by 8760 hours per year and divide by 2000 pounds/ton.