



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
ALLEN COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17232

Fac ID: 0302020314

DATE: 4/26/2007

Accubuilt, Inc.
Paul Nungester
2550 Central Point Parkway
Lima, OH 45804

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

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

You are hereby notified that this action of the Director is final 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 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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 03-17232

Application Number: 03-17232
Facility ID: 0302020314
Permit Fee: **\$600**
Name of Facility: Accubuilt, Inc.
Person to Contact: Paul Nungester
Address: 2550 Central Point Parkway
Lima, OH 45804

Location of proposed air contaminant source(s) [emissions unit(s)]:
2550 Central Point Parkway
Lima, Ohio

Description of proposed emissions unit(s):
Primer spray booth.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director

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Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

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4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

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12. Air Pollution Nuisance

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

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	46.22

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K014) - Specialty Primer Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Coating Emissions: 59.20 lbs of organic compounds (OC)/day; 10.80 tons of OC/year Cleanup Emissions: 2.0 tons of OC/year; See A.I.2.a.
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day
OAC rule 3745-17-11(B)(1)	0.551 lb of particulate emissions (PE)/hour
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-31-05(C)	Emissions of hazardous air pollutants (HAPs) shall not exceed 9.90 tons per year for an individual HAP or 24.90 tons per year for any combination of HAPs (see A.I.2.b).

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-21-09(U)(2)(e)(iii), 3745-17-11(B)(1), and 3745-17-07(A).

2.b This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements.

Annual HAP emissions from emissions unit K001 - K015, P001 - P005, and R001 - R013 shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Emissions Unit ID: K014

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit*, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1 - 1	0.83	2.08
1 - 2	1.66	4.16
1 - 3	2.49	6.24
1 - 4	3.32	8.32
1 - 5	4.15	10.40
1 - 6	4.98	12.48
1 - 7	5.81	14.56
1 - 8	6.64	16.64
1 - 9	7.47	18.72
1 - 10	8.30	20.80
1 - 11	9.13	22.88
1 - 12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

*See A.VI.1

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the total number of gallons of all the coatings employed;
 - d. the OC content of each coating employed, in lbs/gallon;

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- e. the total emissions of OC for each coating employed (b x d), in lbs; and
 - f. the total emissions of OC for all the coatings employed (summation of e for all coatings), in lbs.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
 3. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in lbs/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total emissions of OC for each cleanup material employed (b x c), in lbs;
 - e. the total emissions of OC for all the cleanup materials employed (summation of d for all cleanup materials), in tons; and
 - f. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of e for each calendar month to date from January to December), in tons.
 4. The permittee shall collect and record the following HAP information each month for emissions units K001 - K015, P001 - P005, and R001 - R013, combined:
 - a. the company identification of each coating, glue, autobody finishing material, and cleanup material employed;
 - b. the amount of each individual HAP in each coating, glue, autobody finishing material, and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating, glue, autobody finishing material, and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating, glue, autobody finishing material, and cleanup material employed (b x c), in lbs;

Emissions Unit ID: K014

- e. the total emission rate for each individual HAP from all the coatings, glues, autobody finishing materials, and cleanup materials employed (for each individual HAP, the summation of d for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;
- f. the total HAP emission rate for all HAPs combined from all the coatings, glues, autobody finishing materials, and cleanup materials employed (summation of e for all HAPs for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;
- g. for the first 12 months of operation following the issuance of this permit*, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

*See A.VI.1

IV. Reporting Requirements

- 1. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 59.20 pounds (from the use of coatings);
 - b. all exceedances of the annual OC emission limitation of 2.00 tons (from the cleanup operations);
 - c. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001 - K015, P001 - P005, and R001 - R013 combined); and
 - d. for the first 12 calendar months of operation following the issuance of this permit*, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.II.2.b (for emissions units K001 - K015, P001 - P005, and R001 - R013 combined).

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These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

*See A.VI.1.

3. The permittee shall notify the Northwest District Office of any daily record showing that the coating line employed more than the maximum daily coating usage restriction of 10 gallons. A copy of such record shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation
59.20 lbs of OC/day, from the coating operations

Applicable Compliance Method
Compliance with the daily emissions limitation shall be demonstrated through the monitoring and record keeping requirements established in condition A.III.1 of this permit.
 - b. Emission Limitation
10.80 tons of OC/year, from the coating operations

Applicable Compliance Method
The annual emission limitation was established by multiplying the daily OC emission limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance with the annual limitation shall be assumed.
 - c. Emission Limitation
2.00 tons of OC/year, from the cleanup operations

Applicable Compliance Method
Compliance with the annual emissions limitation shall be demonstrated through the monitoring and record keeping requirements established in condition A.III.3 of this permit.

Emissions Unit ID: K014

- d. Emission Limitation
Coating usage shall not exceed 10 gallons per day
- Applicable Compliance Method
Compliance with the coating usage restriction shall be based upon the record keeping requirements established in condition A.III.1 of this permit.
- e. Emission Limitation
0.551 lb of particulate emissions (PE)/hour
- Applicable Compliance Method
To determine the actual worst case PE rate, the following equation may be used:
- $$E = \text{PE rate (lbs/hr)}$$
- $$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - \text{TE}) \times (1 - \text{CE})$$
- where:
- 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 (60% considering 40 CFR 60.453)
- CE = control efficiency of the control equipment (assumed to be 90%)
- If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).
- f. Emission Limitation
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
- Applicable Compliance Method
The permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).
- g. Emission Limitation
Annual HAP emissions from emissions units K001 - K015, P001 - P005, and R001 - R013 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.
- Applicable Compliance Method
Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements established in condition A.III.4 of this permit.

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2. Formulation data or U.S. EPA Method 24 shall be used to determine the OC contents of all coatings, glues, autobody finishing materials, and cleanup materials.
3. The Hazardous Air Pollutants (HAP) for each coating, glue, autobody finishing material, and cleanup material shall be determined using one of the following methods:
 - a. Method 311 from 40 CFR Part 63, Appendix A;
 - b. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for HAP content; or
 - c. information from the supplier or manufacturer of the materials, where the HAP content is provided or can be calculated.

VI. Miscellaneous Requirements

1. PTI 03-17125 for Accubuilt Inc. was issued on 10/03/06 and also contained a group restriction on individual and combined HAPs (the restrictions are identical to those in the table found in condition A.I.2.b. of this permit). As PTI 03-17125 was issued less than 12 months ago, all operational restrictions, monitoring/recordkeeping, and reporting requirements which reference "the first 12 months following the issuance of this permit" are still in effect. Therefore, the permittee shall use the existing monthly records to demonstrate compliance with the initial 12 month restriction, incorporating any additional HAPs emissions from these new emissions units (K014, K015 P005) into the initial 12 month period.

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K014) - Specialty Primer Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(F) OAC rule 3745-114-01	See B.III.1 through B.III.4

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install (PTI) for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions unit using data from the PTI application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum acceptable ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s) from the combined emissions* of K001 - K015, P001 - P005, and R001 - R012:

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 19.58

Emissions Unit ID: K014

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,632
MAGLC (ug/m3): 4,476

Pollutant: Xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 26.14
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 163.2
MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone
TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 5.54
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 35.11
MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 8.15
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3151.2
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 35.59
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 541.9
MAGLC (ug/m3): 2,023

* includes emissions from PTI 03-17125, issued 10/03/06

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would

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

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing PTI will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final PTI prior to the change.
 4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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Emissions Unit ID: K014

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K015) - Specialty Main Paint Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Coating Emissions: 59.20 lbs of organic compounds (OC)/day; 10.80 tons of OC/year Cleanup Emissions: 2.0 tons of OC/year; See A.I.2.a.
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day
OAC rule 3745-17-11(B)(1)	0.551 lb of particulate emissions (PE)/hour
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-31-05(C)	Emissions of hazardous air pollutants (HAPs) shall not exceed 9.90 tons per year for an individual HAP or 24.90 tons per year for any combination of HAPs (see A.I.2.b).

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-21-09(U)(2)(e)(iii), 3745-17-11(B)(1), and 3745-17-07(A).
- 2.b This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements.

Emissions Unit ID: K015

Annual HAP emissions from emissions unit K001 - K015, P001 - P005, and R001 - R013 shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit*, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1 - 1	0.83	2.08
1 - 2	1.66	4.16
1 - 3	2.49	6.24
1 - 4	3.32	8.32
1 - 5	4.15	10.40
1 - 6	4.98	12.48
1 - 7	5.81	14.56
1 - 8	6.64	16.64
1 - 9	7.47	18.72
1 - 10	8.30	20.80
1 - 11	9.13	22.88
1 - 12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

*See A.VI.1.

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed;

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- c. the total number of gallons of all the coatings employed;
 - d. the OC content of each coating employed, in lbs/gallon;
 - e. the total emissions of OC for each coating employed (b x d), in lbs; and
 - f. the total emissions of OC for all the coatings employed (summation of e for all coatings), in lbs.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall calculate the record the following information each month for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in lbs/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total emissions of OC for each cleanup material employed (b x c), in lbs;
 - e. the total emissions of OC for all the cleanup materials employed (summation of d for all cleanup materials), in tons; and
 - f. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of e for each calendar month to date from January to December), in tons.
4. The permittee shall collect and record the following HAP information each month for emissions units K001 - K015, P001 - P005, and R001 - R013, combined:
 - a. the company identification of each coating, glue, autobody finishing material, and cleanup material employed;
 - b. the amount of each individual HAP in each coating, glue, autobody finishing material, and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating, glue, autobody finishing material, and

Emissions Unit ID: K015

- cleanup material employed;
- d. the emission rate for each individual HAP from each coating, glue, autobody finishing material, and cleanup material employed (b x c), in lbs;
 - e. the total emission rate for each individual HAP from all coatings, glues, autobody finishing materials, and cleanup materials employed (for each individual HAP, the summation of d for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all coatings, glues, autobody finishing materials, and cleanup materials employed (summation of e for all HAPs for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;
 - g. for the first 12 months of operation following the issuance of this permit*, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
 - h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

*See A.VI.1.

IV. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 59.20 pounds (from the use of coatings);
 - b. all exceedances of the annual OC emission limitation of 2.00 tons (from the cleanup operations);
 - c. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001 - K015, P001 - P005, and R001 - R013 combined); and
 - d. for the first 12 calendar months of operation following the issuance of this

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permit*, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.II.2.b (for emissions units K001 - K015, P001 - P005, and R001 - R013 combined).

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

*See A.VI.1.

3. The permittee shall notify the Northwest District Office of any daily record showing that the coating line employed more than the maximum daily coating usage restriction of 10 gallons. A copy of such record shall be sent to the Northwest District Office within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation
59.20 lbs of OC/day, from the coating operations

Applicable Compliance Method
Compliance with the daily emissions limitation shall be demonstrated through the monitoring and record keeping requirements established in condition A.III.1 of this permit.
 - b. Emission Limitation
10.80 tons of OC/year, from the coating operations

Applicable Compliance Method
The annual emission limitation was established by multiplying the daily OC emission limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance with the annual limitation shall be assumed.
 - c. Emission Limitation
2.00 tons of OC/year, from the cleanup operations

Applicable Compliance Method

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Compliance with the annual emissions limitation shall be demonstrated through the monitoring and record keeping requirements established in condition A.III.3 of this permit.

- d. Emission Limitation
Coating usage shall not exceed 10 gallons per day

Applicable Compliance Method

Compliance with the coating usage restriction shall be based upon the record keeping requirements established in condition A.III.1 of this permit.

- e. Emission Limitation
0.551 lb of particulate emissions (PE)/hour

Applicable Compliance Method

To determine the actual worst case PE rate, the following equation may be used:

$$E = \text{PE rate (lbs/hr)}$$

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - \text{TE}) \times (1 - \text{CE})$$

where:

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 (60% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

- f. Emission Limitation
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method

The permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

Emissions Unit ID: K015

g. Emission Limitation

Annual HAP emissions from emissions units K001 - K015, P001 - P005, and R001 - R013 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements established in condition A.III.4 of this permit.

2. Formulation data or U.S. EPA Method 24 shall be used to determine the OC contents of all coatings, glues, autobody finishing materials, and cleanup materials.
3. The Hazardous Air Pollutants (HAP) for each coating, glue, autobody finishing material, and cleanup material shall be determined using one of the following methods:
 - a. Method 311 from 40 CFR Part 63, Appendix A;
 - b. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for HAP content; or
 - c. information from the supplier or manufacturer of the materials, where the HAP content is provided or can be calculated.

VI. Miscellaneous Requirements

1. PTI 03-17125 for Accubuilt Inc. was issued on 10/03/06 and also contained a group restriction on individual and combined HAPs (the restrictions are identical to those in the table found in condition A.I.2.b. of this permit). As PTI 03-17125 was issued less than 12 months ago, all operational restrictions, monitoring/recordkeeping, and reporting requirements which reference "the first 12 months following the issuance of this permit" are still in effect. Therefore, the permittee shall use the existing monthly records to demonstrate compliance with the initial 12 month restriction, incorporating any additional HAPs emissions from these new emissions units (K014, K015 P005) into the initial 12 month period.

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B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K015) - Specialty Main Paint Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(F) OAC rule 3745-114-01	See B.III.1 through B.III.4

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install (PTI) for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions unit using data from the PTI application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum acceptable ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s) from the combined emissions* of K001 - K015, P001 - P005, and R001 - R012:

Pollutant: Toluene
TLV (mg/m3): 188

Accubuilt, Inc.

PTI Application: 03-17222

Facility ID:**0302020314**

Emissions Unit ID: K015

Maximum Hourly Emission Rate (lbs/hr): 19.58
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,632
MAGLC (ug/m3): 4,476

Pollutant: Xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 26.14
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 163.2
MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone
TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 5.54
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 35.11
MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 8.15
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3151.2
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 35.59
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 541.9
MAGLC (ug/m3): 2,023

* includes emissions from PTI 03-17125, issued 10/03/06

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing PTI will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final PTI prior to the change.
4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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Emissions Unit ID: K015

None

Issued: 4/26/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P005) - Specialty Finish Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Autobody Finishing Emissions: 102.00 lbs of organic compounds (OC)/day; 18.62 tons of OC/year Cleanup Emissions: 2.0 tons of OC/year
OAC rule 3745-21-07(G)	None (see A.I.2.a).
OAC rule 3745-17-08	None (see A.I.2.b).
OAC rule 3745-17-07(B)	None (see A.I.2.c).
OAC rule 3745-31-05(C)	Emissions of hazardous air pollutants (HAPs) shall not exceed 9.90 tons per year for an individual HAP or 24.90 tons per year for any combination of HAPs (see A.I.2.d)

2. Additional Terms and Conditions

- 2.a OAC rule 3745-21-07(G) applies only to the use of cleanup materials in this emissions unit. OAC rule 3745-21-07(G) is not applicable to the use of autobody finishing materials because the permittee does not employ any autobody finishing materials in this emissions unit that are liquid organic materials. "Liquid organic material" is defined in OAC rule 3745-21-01(C)(3).
- 2.b This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Allen County, outside the City of Lima). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.c Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not

Emissions Unit ID: P005

apply, because OAC rule 3745-17-08 is not applicable.

- 2.d** This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements.

Annual HAP emissions from emissions unit K001 - K015, P001 - P005, and R001 - R013 shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit*, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1 - 1	0.83	2.08
1 - 2	1.66	4.16
1 - 3	2.49	6.24
1 - 4	3.32	8.32
1 - 5	4.15	10.40
1 - 6	4.98	12.48
1 - 7	5.81	14.56
1 - 8	6.64	16.64
1 - 9	7.47	18.72
1 - 10	8.30	20.80
1 - 11	9.13	22.88
1 - 12	9.90	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

*See A.VI.1.

II. Operational Restrictions

- The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Recordkeeping Requirements

- The permittee shall collect and record the following information each day for this

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emissions unit:

- a. the name and identification number of each autobody finishing material employed;
- b. the number of vans produced; and
- c. the total emissions of OC for all the autobody finishing materials employed (1.b x EF1*), in lbs.

* The following emission factor was supplied by the permittee and was developed based on the permittee's purchase records:

EF1 (for vans) = 5.10 lbs of OC/vehicle produced

2. The permittee shall calculate the record the following information each month for this emissions unit:

- a. the name and identification number of each cleanup material employed;
- b. the number of vans produced;
- c. the total emissions of OC for all cleanup materials employed (3.b x EFa*), in lbs; and
- d. documentation on whether or not each cleanup material employed is a photochemically reactive material.

* The following emission factor was supplied by the permittee and was developed based on the permittee's purchase records:

EFa (for vans) = 2.67 lbs of OC/vehicle produced

3. The permittee shall collect and record the following HAP information each month for emissions units K001 - K015, P001 - P005, and R001 - R013, combined:

- a. the company identification of each coating, glue, autobody finishing material, and cleanup material employed;
- b. the amount of each individual HAP in each coating, glue, autobody finishing

Emissions Unit ID: P005

- material, and cleanup material, in lbs/gallon, as applied;
- c. the number of gallons of each coating, glue, autobody finishing material, and cleanup material employed;
 - d. the emission rate for each individual HAP from each coating, glue, autobody finishing material, and cleanup material employed (C.3.b x C.3.c), in lbs;
 - e. the total emission rate for each individual HAP from all coatings, glues, autobody finishing materials, and cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all coatings, glues, autobody finishing materials, and cleanup materials employed (summation of C.3.e for all HAPs for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;
 - g. for the first 12 months of operation following the issuance of this permit*, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
 - h. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

*See A.VI.1.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 102.00 pounds (from the use of autobody finishing materials);
 - b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations);
 - c. each month during which a photochemically reactive cleanup material was employed.
 - d. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001 - K015, P001 - P005, and R001 - R013 combined); and

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- e. for the first 12 calendar months of operation following the issuance of this permit*, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.e (for emissions units K001 - K015, P001 - P005, and R001 - R013 combined).

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These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

*See A.VI.1.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation
102.00 lbs of organic compounds (OC)/day, from the autobody finishing operations

Applicable Compliance Method

Compliance with the annual emissions limitation shall be demonstrated through the monitoring and record keeping requirements established in condition A.III.1 of this permit.

- b. Emission Limitation
18.62 tons of OC/year, from the autobody finishing operations

Applicable Compliance Method

The annual emission limitation was established by multiplying the daily OC emission limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance with the annual limitation will be assumed.

- c. Emission Limitation
2.00 tons of OC/year, from the cleanup operations

Applicable Compliance Method

Compliance with the annual emissions limitation shall be demonstrated through the monitoring and record keeping requirements established in condition A.III.2 of this permit.

- d. Emission Limitation
Annual HAP emissions from emissions units K001 - K015, P001 - P005, and R001 - R013 combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any

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combination of HAPs.

Applicable Compliance Method

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements established in condition A.III.2 of this permit.

2. Formulation data or U.S. EPA Method 24 shall be used to determine the OC contents of all coatings, glues, autobody finishing materials, and cleanup materials.
3. The Hazardous Air Pollutants (HAP) for each coating, glue, autobody finishing material, and cleanup material shall be determined using one of the following methods:
 - a. Method 311 from 40 CFR Part 63, Appendix A;
 - b. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for HAP content; or
 - c. information from the supplier or manufacturer of the materials, where the HAP content is provided or can be calculated.

VI. Miscellaneous Requirements

1. PTI 03-17125 for Accubuilt Inc. was issued on 10/03/06 and also contained a group restriction on individual and combined HAPs (the restrictions are identical to those in the table found in condition A.I.2.b. of this permit). As PTI 03-17125 was issued less than 12 months ago, all operational restrictions, monitoring/recordkeeping, and reporting requirements which reference "the first 12 months following the issuance of this permit" are still in effect. Therefore, the permittee shall use the existing monthly records to demonstrate compliance with the initial 12 month restriction, incorporating any additional HAPs emissions from these new emissions units (K014, K015 P005) into the initial 12 month period.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P005) - Specialty Finish Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(F) OAC rule 3745-114-01	See B.III.1 through B.III.4

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install (PTI) for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions unit using data from the PTI application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum acceptable ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s) from the combined emissions* of K001 - K015, P001 - P005, and R001 - R012:

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 19.58

Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 3,632

MAGLC (ug/m³): 4,476

Pollutant: Xylene

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TLV (mg/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 26.14
Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 163.2
MAGLC (ug/m³): 10,333

Pollutant: Methyl Ethyl Ketone
TLV (mg/m³): 590
Maximum Hourly Emission Rate (lbs/hr): 5.54
Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 35.11
MAGLC (ug/m³): 14,048

Pollutant: Ethyl Benzene
TLV (mg/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 8.15
Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 3151.2
MAGLC (ug/m³): 10,333

Pollutant: Styrene
TLV (mg/m³): 85
Maximum Hourly Emission Rate (lbs/hr): 35.59
Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 541.9
MAGLC (ug/m³): 2,023

* includes emissions from PTI 03-17125, issued 10/03/06

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

Emissions Unit ID: P005

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing PTI will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final PTI prior to the change.
4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None