



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
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TELE: (614) 644-3020 FAX: (614) 644-2329

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P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL

ALLEN COUNTY

Application No:

03-17125

Fac ID: 0302020314

DATE: 10/3/2006

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

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/3/2006
Effective Date: 10/3/2006**

**FINAL PERMIT TO INSTALL
03-17125**

Application Number: 03-17125
Facility ID: 0302020314
Permit Fee: **\$6000**
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):
Modification of existing coating operations to establish synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions

may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

Accubuilt, Inc.**PTI Application: 03-17125****Issued: 10/3/2006****Facility ID:****0302020314**

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	75.69
Individual Hazardous Air Pollutants (HAPs)	9.90
Combined HAPs	24.90

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K001

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K001) - Limousine Paint Station (Booth No. 15)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

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 25.00 tons of OC/year for emissions units K001 - K013, combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012, combined See A.2.a.
OAC rule 3745-21-09(U)(2)(e)(iii)	Coatings 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.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).

Accubuilt, Inc.**PTI Application: 03-17125****Issued: 10/3/2006****Facility ID: 0302020314****Emissions Unit ID: K001**

- 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 - K013, P001 - P004, 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.

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.

B. Operational Restrictions

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

2. 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).

C. 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;
 - 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 each month the total emissions of OC for all the coatings employed [summation of the daily OC emission rates, from section C.1.f, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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. documentation on whether or not each cleanup material employed is a photochemically reactive material.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K001 - K004 + summation of OC emissions from record keeping for K005 - K013), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all the cleanup materials employed (summation of C.4.e above for K001 - K004 + summation of OC emissions from record keeping of cleanup operations for K005 - K012, P001 - P004, and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.

7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.
11. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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.b (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method
Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
 - b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.
 - c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.
 - d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method
Compliance with the monthly allowable OC emission limitation shall be based upon the record keeping requirements specified in section C.4.
 - e. 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 in section C.1.

- f. 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).

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

Applicable Compliance Method

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

- h. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

- i. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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.

Accubuilt, Inc.

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Emissions Unit ID: K001

Applicable Compliance Method

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.7 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.

F. Miscellaneous Requirements

None

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K002

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K002) - Funeral Coach Prime Station (Booth No. 8)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.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.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).

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- 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 - K013, P001 - P004, 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.

B. Operational Restrictions

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

2. 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).

C. 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 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 coating 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 each month the total emissions of OC for all the coatings employed [summation of the daily OC emission rates, from section C.1.f, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 cleanup materials employed (summation of d for all cleanup materials), in tons; and
 - f. documentation on whether or not each cleanup material employed is a photochemically reactive material.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K001 - K004 + summation of OC emissions from recordkeeping for K005 - K013), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.e above for K001 - K004 + summation of OC emissions from recordkeeping of cleanup operations for K005 - K012, P001 - P004, and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.

7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.e for all HAPs for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;

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- 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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.
11. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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.b (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method
Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
 - b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.
 - c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.
 - d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method
Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.
 - e. 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 in section C.1.

- f. 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).

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

Applicable Compliance Method

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

- h. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

- i. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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.

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Applicable Compliance Method

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section C.7 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.

F. Miscellaneous Requirements

None

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Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K003

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K003) - Funeral Coach Paint Station (Booth No. 12)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.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.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).

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- 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 - K013, P001 - P004, 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.

B. Operational Restrictions

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

2. 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).

C. 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 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 coating 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 each month the total emissions of OC for all the coatings employed [summation of the daily OC emission rates, from section C.1.f, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 cleanup materials employed (summation of d for all cleanup materials), in tons; and
 - f. documentation on whether or not each cleanup material employed is a photochemically reactive material.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K001 - K004 + summation of OC emissions from recordkeeping for K005 - K013), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.e above for K001 - K004 + summation of OC emissions from recordkeeping of cleanup operations for K005 - K012, P001 - P004, and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.

7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.
11. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and

- 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.b (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.

- c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

e. 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 in section C.1.

f. 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).

g. Emission Limitation

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

Applicable Compliance Method

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

- h. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

- i. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K004

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K004) - Funeral Coach Paint Station (Booth No. 13)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.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.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).

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K004

- 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 - K013, P001 - P004, 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.

B. Operational Restrictions

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

2. 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).

C. 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 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 coating 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 each month the total emissions of OC for all the coatings employed [summation of the daily OC emission rates, from section C.1.f, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 cleanup materials employed (summation of d for all cleanup materials), in tons; and
 - f. documentation on whether or not each cleanup material employed is a photochemically reactive material.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K001 - K004 + summation of OC emissions from recordkeeping for K005 - K013), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.e above for K001 - K004 + summation of OC emissions from recordkeeping of cleanup operations for K005 - K012, P001 - P004, and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.

7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.
11. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and

- 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.b (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.

- c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

e. 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 in section C.1.

f. 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).

g. Emission Limitation

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

Applicable Compliance Method

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

- h. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

- i. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K005

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K005) - Small Parts Paint Station (Booth No. 22)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day (see A.2.b)
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.2.c)

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** The gallon/day coating usage restriction for this emissions unit cannot be exceeded since its potential to emit is less than 10 gallons/day. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this usage restriction.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. 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).

C. 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 limousines produced;
 - c. the number of hearses produced; and
 - d. the total emissions of OC for all coatings employed $[(1.b \times EF1^*) + (1.c \times EF2^*)]$, in lbs.

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

EF1 (for limousines) = 1.63 lbs of OC/vehicle produced

EF2 (for hearses) = 1.63 lbs of OC/vehicle produced

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 each month the total emissions of OC for all coatings employed [summation of the daily OC emission rates, from section C.1.d, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 limousines produced;
 - c. the number of hearses produced;

- d. the total emissions of OC for all cleanup materials employed $[(4.b \times EFa^*) + (4.c \times EFb^*)]$, in lbs; and
- e. documentation on whether or not each cleanup material employed is a photochemically reactive material.

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

EF1 (for limousines) = 4.04 lbs of OC/vehicle produced

EF2 (for hearses) = 4.04 lbs of OC/vehicle produced

- 5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K005 - K013 + summation of OC emissions from recordkeeping for K001 - K004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.
- 6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.d above for K005, K009, K011, and K012 + summation of OC emissions from recordkeeping of cleanup operations for K005 - K012, P001 - P004, and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.
- 7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.

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

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;

- 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method
Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
 - b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.
 - c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

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

Applicable Compliance Method

Compliance with the daily coating usage restriction shall be assumed since the emissions unit's maximum usage rate is less than 10 gallons per day.

- f. 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).

g. Emission Limitation

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

Applicable Compliance Method

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

h. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

i. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K006

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K006) - Fleetwood Prime Station (Booth No. 1)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day (see A.2.b)
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.2.c)

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** The gallon/day coating usage restriction for this emissions unit cannot be exceeded since its potential to emit is less than 10 gallons/day. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this usage restriction.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. 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).

C. 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 vans produced; and
 - c. the total emissions of OC for all coatings 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) = 5.27 lbs of OC/vehicle produced

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 each month the total emissions of OC for all the coatings employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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; and
 - c. the total emissions of OC for all cleanup materials employed (4.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) = 0.88 lb of OC/vehicle produced

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K005 - K013 + summation of OC emissions from recordkeeping for K001 - K004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.c above for K006 - K008, K010, K013, P001 - P004, and R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K005, K009, K011, and K012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.
7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K006

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.

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

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.

- c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

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

Applicable Compliance Method

Compliance with the daily coating usage restriction shall be assumed since the emissions unit's maximum usage rate is less than 10 gallons per day.

- f. 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).

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

Applicable Compliance Method

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

- h. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

- i. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K007

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K007) - Van Main Paint (Booth No. 1) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day (see A.2.b)
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.2.c)

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).

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K007

- 2.b** The gallon/day coating usage restriction for this emissions unit cannot be exceeded since its potential to emit is less than 10 gallons/day. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this usage restriction.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. 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).

C. 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 vans produced; and
 - c. the total emissions of OC for all coatings 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) = 5.27 lbs of OC/vehicle produced

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 each month the total emissions of OC for all the coatings employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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; and
 - c. the total emissions of OC for all cleanup materials employed (4.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) = 0.88 lb of OC/vehicle produced

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K005 - K013 + summation of OC emissions from recordkeeping for K001 - K004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.c above for K006 - K008, K010, K013, P001 - P004, and R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K005, K009, K011, and K012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.
7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.

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

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.

- c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

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

Applicable Compliance Method

Compliance with the daily coating usage restriction shall be assumed since the emissions unit's maximum usage rate is less than 10 gallons per day.

- f. 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).

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

Applicable Compliance Method

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

- h. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

- i. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K008

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K008) - Limousine Line Prep Pad Final Touch-Up Station (Booth No. 16) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day (see A.2.b)
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.2.c)

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** The gallon/day coating usage restriction for this emissions unit cannot be exceeded since its potential to emit is less than 10 gallons/day. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this usage restriction.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. 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).

C. 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 limousines produced; and
 - c. the total emissions of OC for all coatings 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) = 5.27 lbs of OC/vehicle produced

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 each month the total emissions of OC for all the coatings employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 limousines produced; and
 - c. the total emissions of OC for all cleanup materials employed (4.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 limousines) = 0.88 lb of OC/vehicle produced

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K005 - K013 + summation of OC emissions from recordkeeping for K001 - K004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.c above for K006 - K008, K010, K013, P001 - P004, and R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K005, K009, K011, and K012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.
7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K008

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.

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

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.

- c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

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

Applicable Compliance Method

Compliance with the daily coating usage restriction shall be assumed since the emissions unit's maximum usage rate is less than 10 gallons per day.

- f. 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).

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

Applicable Compliance Method

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

- h. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

- i. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K009

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K009) - Special Line Paint Station (Booth No. 25)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day (see A.2.b)
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.2.c)

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).

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K009

- 2.b** The gallon/day coating usage restriction for this emissions unit cannot be exceeded since its potential to emit is less than 10 gallons/day. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this usage restriction.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. 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).

C. 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 limousines produced;
 - c. the number of hearses produced; and
 - d. the total emissions of OC for all coatings employed $[(1.b \times EF1^*) + (1.c \times EF2^*)]$, in lbs.

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

EF1 (for limousines) = 1.00 lb of OC/vehicle produced

EF2 (for hearses) = 1.00 lb of OC/vehicle produced

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 each month the total emissions of OC for all coatings employed [summation of the daily OC emission rates, from section C.1.d, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 limousines produced;
 - c. the number of hearses produced;

- d. the total emissions of OC for all cleanup materials employed $[(4.b \times EFa^*) + (4.c \times EFb^*)]$, in lbs; and
- e. documentation on whether or not each cleanup material employed is a photochemically reactive material.

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

EFa (for limousines) = 0.88 lb of OC/vehicle produced

EFb (for hearses) = 0.88 lb of OC/vehicle produced

- 5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K005 - K013 + summation of OC emissions from recordkeeping for K001 - K004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.
- 6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.d above for K005, K009, K011, and K012 + summation of OC emissions from recordkeeping of cleanup operations for K005 - K012, P001 - P004, and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.
- 7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.

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

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;

- 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method
Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
 - b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.
 - c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

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

Applicable Compliance Method

Compliance with the daily coating usage restriction shall be assumed since the emissions unit's maximum usage rate is less than 10 gallons per day.

- f. 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).

g. Emission Limitation

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

Applicable Compliance Method

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

h. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

i. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: K010

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K010) - Service Department Station (Booth No. 21)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day (see A.2.b)
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.2.c)

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).

Accubuilt, Inc.**PTI Application: 03-17125****Issued: 10/3/2006****Facility ID: 0302020314****Emissions Unit ID: K010**

- 2.b** The gallon/day coating usage restriction for this emissions unit cannot be exceeded since its potential to emit is less than 10 gallons/day. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this usage restriction.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. 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).

C. 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 limousines produced; and
 - c. the total emissions of OC for all coatings 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 limousines) = 1.25 lbs of OC/vehicle produced

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 each month the total emissions of OC for all the coatings employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 limousines produced; and
 - c. the total emissions of OC for all cleanup materials employed (4.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 limousines) = 1.64 lbs of OC/vehicle produced

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K005 - K013 + summation of OC emissions from recordkeeping for K001 - K004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.c above for K006 - K008, K010, K013, P001 - P004, and R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K005, K009, K011, and K012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.
7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4,476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.

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

D. Reporting Requirements

1. The permittee shall 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 the Northwest District Office within 30 days after the event occurs.
2. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method
Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
 - b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.
 - c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

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

Applicable Compliance Method

Compliance with the daily coating usage restriction shall be assumed since the emissions unit's maximum usage rate is less than 10 gallons per day.

- f. 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).

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

Applicable Compliance Method

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

- h. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

- i. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K011) - Service Department - Prep Pad Station (Booth No. 20) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day (see A.2.b)
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.2.c)

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** The gallon/day coating usage restriction for this emissions unit cannot be exceeded since its potential to emit is less than 10 gallons/day. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this usage restriction.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. 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).

C. 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 limousines produced;
 - c. the number of hearses produced; and
 - d. the total emissions of OC for all coatings employed $[(1.b \times EF1^*) + (1.c \times EF2^*)]$, in lbs.

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

EF1 (for limousines) = 5.27 lbs of OC/vehicle produced

EF2 (for hearses) = 5.27 lbs of OC/vehicle produced

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 each month the total emissions of OC for all coatings employed [summation of the daily OC emission rates, from section C.1.d, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 limousines produced;
 - c. the number of hearses produced;

- d. the total emissions of OC for all cleanup materials employed $[(4.b \times EFa^*) + (4.c \times EFb^*)]$, in lbs; and
- e. documentation on whether or not each cleanup material employed is a photochemically reactive material.

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

EFa (for limousines) = 0.88 lb of OC/vehicle produced

EFb (for hearses) = 0.88 lb of OC/vehicle produced

- 5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K005 - K013 + summation of OC emissions from recordkeeping for K001 - K004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.
- 6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.d above for K005, K009, K011, and K012 + summation of OC emissions from recordkeeping of cleanup operations for K005 - K012, P001 - P004, and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.
- 7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 3,027

MAGLC (ug/m³): 4, 476

Pollutant: Xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 135.2

MAGLC (ug/m³): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.

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

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;

- 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method
Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
 - b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.
 - c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

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

Applicable Compliance Method

Compliance with the daily coating usage restriction shall be assumed since the emissions unit's maximum usage rate is less than 10 gallons per day.

- f. 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).

g. Emission Limitation

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

Applicable Compliance Method

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

h. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

i. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K012) - Service Department - Metal Finish Station (Booth No. 19) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day (see A.2.b)
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.2.c)

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** The gallon/day coating usage restriction for this emissions unit cannot be exceeded since its potential to emit is less than 10 gallons/day. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this usage restriction.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. 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).

C. 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 limousines produced;
 - c. the number of hearses produced; and
 - d. the total emissions of OC for all coatings employed $[(1.b \times EF1^*) + (1.c \times EF2^*)]$, in lbs.

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

EF1 (for limousines) = 1.00 lb of OC/vehicle produced

EF2 (for hearses) = 1.00 lb of OC/vehicle produced

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 each month the total emissions of OC for all coatings employed [summation of the daily OC emission rates, from section C.1.d, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 limousines produced;
 - c. the number of hearses produced;

- d. the total emissions of OC for all cleanup materials employed $[(4.b \times EFa^*) + (4.c \times EFb^*)]$, in lbs; and
- e. documentation on whether or not each cleanup material employed is a photochemically reactive material.

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

EFa (for limousines) = 0.88 lb of OC/vehicle produced

EFb (for hearses) = 0.88 lb of OC/vehicle produced

- 5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K005 - K013 + summation of OC emissions from recordkeeping for K001 - K004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.
- 6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.d above for K005, K009, K011, and K012 + summation of OC emissions from recordkeeping of cleanup operations for K005 - K012, P001 - P004, and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.
- 7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 3,027

MAGLC (ug/m³): 4, 476

Pollutant: Xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 135.2

MAGLC (ug/m³): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.

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

D. Reporting Requirements

1. The permittee shall 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 the Northwest District Office within 30 days after the event occurs.
2. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;

- 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method
Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
 - b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.
 - c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

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

Applicable Compliance Method

Compliance with the daily coating usage restriction shall be assumed since the emissions unit's maximum usage rate is less than 10 gallons per day.

- f. 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).

g. Emission Limitation

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

Applicable Compliance Method

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

h. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

i. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K013) - Prep-Pad Work Station (Booth No. 10 and 13) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

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 25.00 tons of OC/year for emissions units K001 - K013 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage shall not exceed 10 gallons per day (see A.2.b)
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.2.c)

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).

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- 2.b** The gallon/day coating usage restriction for this emissions unit cannot be exceeded since its potential to emit is less than 10 gallons/day. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this usage restriction.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
2. 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).

C. 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 hearses produced; and
 - c. the total emissions of OC for all coatings 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 hearses) = 1.00 lb of OC/vehicle produced

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 each month the total emissions of OC for all the coatings employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
4. 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 hearses produced; and
 - c. the total emissions of OC for all cleanup materials employed (4.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 hearses) = 0.45 lb of OC/vehicle produced

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013 combined:
 - a. the total OC emissions for all coatings employed (summation of C.3 above for K005 - K013 + summation of OC emissions from recordkeeping for K001 - K004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all coatings employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.4.c above for K006 - K008, K010, K013, P001 - P004, and R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K005, K009, K011, and K012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.6.a for each calendar month to date from January to December), in tons.
7. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.7.b x C.7.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.7.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.7.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.
8. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. 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.

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

D. Reporting Requirements

1. The permittee shall 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 annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units K001 - K013 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. 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 monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

- 4. 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.

E. 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 organic compounds (OC)/hour from coating operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- b. Emission Limitation
10.80 tons of OC/year from 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 will be assumed.

- c. Emission Limitation
25.00 tons of OC/year for emissions units K001 - K013 combined from coating operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- d. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.4.

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

Applicable Compliance Method

Compliance with the daily coating usage restriction shall be assumed since the emissions unit's maximum usage rate is less than 10 gallons per day.

- f. 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).

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

Applicable Compliance Method

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

- h. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.6.

- i. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.7 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.

F. Miscellaneous Requirements

None

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Facility ID: 0302020314

Emissions Unit ID: P001

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P001) - Limousine Line Metal Finish (Booth No. 4) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

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; 9.11 tons of OC/year for emissions units P001 - P004 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	None (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G).
- 2.b 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).

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- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply, because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 autobody finishing material employed;
 - b. the number of limousines produced; and
 - c. the total emissions of OC for all 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 limousines) = 5.10 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all autobody finishing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of limousines produced; and
 - 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 limousines) = 2.67 lbs of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units P001 - P004 combined:
 - a. the total OC emissions for all autobody finishing materials employed (summation of C.1.c for P001 - P004, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all autobody finishing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.
5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for P001 - P004 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

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Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.

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

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units P001 - P004 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. 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 for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and

- 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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 autobody finishing operations

Applicable Compliance Method
Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.
 - b. Emission Limitation
9.11 tons of OC/year for emissions units P001 - P004 combined from autobody finishing operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.
 - c. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method
Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.
 - d. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

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Emissions Unit ID: P001

e. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P002) - Funeral Coach Metal Finish (Booth No. 5 and 6) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

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; 9.11 tons of OC/year for emissions units P001 - P004 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	None (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G).
- 2.b 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).

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- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply, because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, and R001 - R012 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 autobody finishing material employed;
 - b. the number of hearses produced; and
 - c. the total emissions of OC for all 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 hearses) = 4.33 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all autobody finishing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of hearses produced; and
 - 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 hearses) = 2.38 lbs of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units P001 - P004 combined:
 - a. the total OC emissions for all autobody finishing materials employed (summation of C.1.c for P001 - P004, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all autobody finishing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.
5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for P001 - P004 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K013 and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.d for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;

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Emissions Unit ID: P002

- f. the total HAP emission rate for all HAPs combined from all coatings, glues, autobody finishing materials, and cleanup materials employed (summation of C.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units P001 - P004 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. 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 for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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 autobody finishing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

b. Emission Limitation

9.11 tons of OC/year for emissions units P001 - P004 combined from autobody finishing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

c. Emission Limitation

2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

d. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: P002

e. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P003) - Funeral Coach Pre-Prime (Booth No. 7)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

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; 9.11 tons of OC/year for emissions units P001 - P004 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	None (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G).
- 2.b 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).

Accubuilt, Inc.**PTI Application: 03-17125****Issued: 10/3/2006****Facility ID: 0302020314****Emissions Unit ID: P003**

- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply, because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 autobody finishing material employed;
 - b. the number of hearses produced; and
 - c. the total emissions of OC for all 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 hearses) = 1.00 lb of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all autobody finishing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of hearses produced; and
 - 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 hearses) = 2.04 lbs of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units P001 - P004 combined:
 - a. the total OC emissions for all autobody finishing materials employed (summation of C.1.c for P001 - P004, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all autobody finishing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for P001 - P004 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K013 and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units P001 - P004 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. 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 for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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 autobody finishing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

b. Emission Limitation

9.11 tons of OC/year for emissions units P001 - P004 combined from autobody finishing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

c. Emission Limitation

2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

d. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: P003

e. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P004) - Special Line Metal Finish (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

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; 9.11 tons of OC/year for emissions units P001 - P004 combined Cleanup Emissions: 2.0 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	None (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G).
- 2.b 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).

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- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply, because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 autobody finishing material employed;
 - b. the number of vans produced; and
 - c. the total emissions of OC for all 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 and record each month the total emissions of OC for all autobody finishing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of vans produced; and
 - 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

4. The permittee shall calculate and record the following information each month for emissions units P001 - P004 combined:
 - a. the total OC emissions for all autobody finishing materials employed (summation of C.1.c for P001 - P004, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all autobody finishing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.
5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for P001 - P004 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and R001 - R012), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.d for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;

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- f. the total HAP emission rate for all HAPs combined from all coatings, glues, autobody finishing materials, and cleanup materials employed (summation of C.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units P001 - P004 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. 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 for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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 autobody finishing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

b. Emission Limitation

9.11 tons of OC/year for emissions units P001 - P004 combined from autobody finishing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

c. Emission Limitation

2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

d. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

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e. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

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Facility ID: 0302020314

Emissions Unit ID: R001

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R001) - Limousine Floor, Roof Pad and Headliner Glue Stations (Stations No. 12 and 13) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)(2)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G)(2).
- 2.b** The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8

pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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

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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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of limousines produced; and
 - c. the total emissions of OC for all gluing 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 limousines) = 9.61 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of limousines produced; and
 - 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 limousines) = 0.85 lb of OC/vehicle produced

- 4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.
- 5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.
- 6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.

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

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);
 - b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and

- 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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
8.00 lbs of organic compounds (OC)/hour from gluing operations

Applicable Compliance Method

Compliance will the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation
40.00 lbs of OC/day from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation
7.30 tons of OC/year from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation
16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

 - e. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method
Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

 - f. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

 - g. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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

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- c. information from the supplier or manufacturer of the materials, where the HAP content is provided or can be calculated.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R002) - Limousine Vinyl Top Glue Station (Booth No. 9) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G)(2).
- 2.b The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8 pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

Accubuilt, Inc.**PTI Application: 03-17125****Issued: 10/3/2006****Facility ID: 0302020314****Emissions Unit ID: R002**

- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of limousines produced; and
 - c. the total emissions of OC for all gluing 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 limousines) = 2.31 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of limousines produced; and
 - 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 limousines) = 0.45 lb of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);
 - b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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

- a. 8.00 lbs of organic compounds (OC)/hour from gluing operations

- Applicable Compliance Method

- Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

- If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation

- b. 40.00 lbs of OC/day from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation

- c. 7.30 tons of OC/year from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation

- d. 16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

- Applicable Compliance Method

- Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

- e. Emission Limitation

- e. 2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

f Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

g. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R003) - Funeral Coach Quarter Panel and Roof Assembly (Booth No. 12) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
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 percent 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.2.c)

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), 3745-21-07(G)(2), 3745-17-11(B)(1), and 3745-17-07(A).

- 2.b** The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8 pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.
- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. 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 gluing material employed;
 - b. the number of hearses produced; and
 - c. the total emissions of OC for all gluing 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 hearses) = 1.00 lb of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of hearses produced; and
 - 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 hearses) = 1.78 lb of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.
5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 3,027

MAGLC (ug/m³): 4, 476

Pollutant: Xylene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 135.2

MAGLC (ug/m³): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m³): 29.26

MAGLC (ug/m³): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);
 - b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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

- a. 8.00 lbs of organic compounds (OC)/hour from gluing operations

- Applicable Compliance Method

- Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

- If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation

- b. 40.00 lbs of OC/day from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation

- c. 7.30 tons of OC/year from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation

- d. 16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

- e. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

- f. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- g. 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).

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

Applicable Compliance Method

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

i. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R004) - Funeral Coach Vinyl Top Glue Station (Booth No. 14) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G)(2).
- 2.b The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8 pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

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- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of hearses produced; and
 - c. the total emissions of OC for all gluing 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 hearses) = 12.72 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of hearses produced; and
 - 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 hearses) = 0.85 lb of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.
5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.
6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);
 - b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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

- a. 8.00 lbs of organic compounds (OC)/hour from gluing operations

- Applicable Compliance Method

- Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

- If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation

- b. 40.00 lbs of OC/day from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation

- c. 7.30 tons of OC/year from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation

- d. 16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

- e. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

- f. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- g. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

Accubuilt, Inc.

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Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: R004

F. Miscellaneous Requirements

None

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: R005

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R005) - Funeral Coach Headliner and Interior Glue Station (Booth No. 24) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G)(2).
- 2.b** The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8

pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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

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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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of hearses produced; and
 - c. the total emissions of OC for all gluing 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 hearses) = 4.77 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of hearses produced; and
 - 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 hearses) = 0.45 lb of OC/vehicle produced

- 4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.
- 5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.
- 6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: R005

Maximum Hourly Emission Rate (lbs/hr): 4.62
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26
MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.

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

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);
 - b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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
8.00 lbs of organic compounds (OC)/hour from gluing operations

Applicable Compliance Method

Compliance will the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation
40.00 lbs of OC/day from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation
7.30 tons of OC/year from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation
16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations
- Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.
- e. Emission Limitation
2.00 tons of OC/year from cleanup operations
- Applicable Compliance Method
Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.
- f. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations
- Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.
- g. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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

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- c. information from the supplier or manufacturer of the materials, where the HAP content is provided or can be calculated.

F. Miscellaneous Requirements

None

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Emissions Unit ID: R006

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R006) - Special Line Vinyl Top, Floor and Headliner Glue Station (Booth No. 5 and 6) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G)(2).
- 2.b** The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8

pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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

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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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of vans produced; and
 - c. the total emissions of OC for all gluing 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) = 9.61 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of vans produced; and
 - 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) = 0.85 lb of OC/vehicle produced

- 4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.
- 5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.
- 6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

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Maximum Hourly Emission Rate (lbs/hr): 4.62
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26
MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.

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

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);
 - b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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
8.00 lbs of organic compounds (OC)/hour from gluing operations

Applicable Compliance Method

Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation
40.00 lbs of OC/day from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation
7.30 tons of OC/year from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation
16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

 - e. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method
Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

 - f. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

 - g. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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

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- c. information from the supplier or manufacturer of the materials, where the HAP content is provided or can be calculated.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R007) - Fleetwood Vinyl Top Station (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G)(2).
- 2.b The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8 pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

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- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of vans produced; and
 - c. the total emissions of OC for all gluing 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) = 9.61 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of vans produced; and
 - 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) = 0.85 lb of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.d for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;

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- f. the total HAP emission rate for all HAPs combined from all coatings, glues, autobody finishing materials, and cleanup materials employed (summation of C.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

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Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);
 - b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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

- a. 8.00 lbs of organic compounds (OC)/hour from gluing operations

- Applicable Compliance Method

- Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

- If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation

- b. 40.00 lbs of OC/day from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation

- c. 7.30 tons of OC/year from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation

- d. 16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

- e. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

- f. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- g. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

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F. Miscellaneous Requirements

None

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Emissions Unit ID: R008

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R008) - Hearse and Limousine Final Finish Area - Touchup, Repair and Inspection Area (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
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.2.e)

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) and 3745-21-07(G)(2).
- 2.b The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8

pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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

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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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of hearses produced; and
 - c. the total emissions of OC for all gluing 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 hearses) = 1.00 lb of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of hearses produced; and
 - 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 hearses) = 0.57 lb of OC/vehicle produced

- 4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.
- 5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.
- 6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

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Maximum Hourly Emission Rate (lbs/hr): 4.62
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26
MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 6.79
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626
MAGLC (ug/m3): 10,333

Pollutant: Styrene
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 29.66
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6
MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.

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

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);
 - b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
 - 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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
8.00 lbs of organic compounds (OC)/hour from gluing operations

Applicable Compliance Method

Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation
40.00 lbs of OC/day from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation
7.30 tons of OC/year from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation
16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

 - e. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method
Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

 - f. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method
Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

 - g. Emission Limitation
Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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

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- c. information from the supplier or manufacturer of the materials, where the HAP content is provided or can be calculated.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R009) - Seat Assembly (Trim Area) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
OAC rule 3745-17-11(B)(1)	0.551 lb of particulate emissions (PE)/hr
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 (4.9tons per year for any combination of HAPs (see A.2.c)

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), 3745-21-07(G)(2), 3745-17-11(B)(1), and 3745-17-07(A).
- 2.b The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8

pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of hearses produced; and
 - c. the total emissions of OC for all gluing 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 hearses) = 1.00 lb of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of hearses produced; and
 - 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 hearses) = 1.78 lbs of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.e for all HAPs for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;

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- 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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. 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.
11. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
- a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);

- b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
- 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

3. The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions from the stack serving this emissions unit were observed, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. 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
8.00 lbs of organic compounds (OC)/hour from gluing operations

Applicable Compliance Method

Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation
40.00 lbs of OC/day from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

c. Emission Limitation

7.30 tons of OC/year from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

d. Emission Limitation

16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

e. Emission Limitation

2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

f. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

g. 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).

h. Emission Limitation

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

Applicable Compliance Method

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

i. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R010) - Door Panels (Trim Area) (Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
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 percent 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.2.e)

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), 3745-21-07(G)(2), 3745-17-11(B)(1), and 3745-17-07(A).
- 2.b The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8

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pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of limousines produced; and
 - c. the total emissions of OC for all gluing 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 limousines) = 1.00 lb of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of limousines produced; and
 - 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 limousines) = 0.45 lb of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all gluing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.e for all HAPs for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;

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- 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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. 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.
11. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
- a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);

- b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
- 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

3. The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions from the stack serving this emissions unit were observed, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. 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
8.00 lbs of organic compounds (OC)/hour from gluing operations

Applicable Compliance Method

Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation
40.00 lbs of OC/day from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

c. Emission Limitation

7.30 tons of OC/year from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

d. Emission Limitation

16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

e. Emission Limitation

2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

f. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

g. 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).

h. Emission Limitation

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

Applicable Compliance Method

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

i. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R011) - Wheel House Panels (Trim Area)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
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 percent 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.2.e)

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), 3745-21-07(G)(2), 3745-17-11(B)(1), and 3745-17-07(A).
- 2.b The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8

pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of hearses produced; and
 - c. the total emissions of OC for all gluing 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 hearses) = 6.36 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of hearses produced; and
 - 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 hearses) = 0.45 lb of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all autobody finishing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.e for all HAPs for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;

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- 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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. 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.
11. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
- a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);

- b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
- 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

3. The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions from the stack serving this emissions unit were observed, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. 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
8.00 lbs of organic compounds (OC)/hour from gluing operations

Applicable Compliance Method

Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation
40.00 lbs of OC/day from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

c. Emission Limitation

7.30 tons of OC/year from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

d. Emission Limitation

16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

e. Emission Limitation

2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

f. Emission Limitation

17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

g. 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).

h. Emission Limitation

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

Applicable Compliance Method

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

i. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R012) - Interior Trim Panels (Trim Area)
(Modification of PTI #03-13208 issued on 10/14/99 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; 16.50 tons of OC/year for emissions units R001 - R012 combined Cleanup Emissions: 2.00 tons of OC/month; 17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined See A.2.a
OAC rule 3745-21-07(G)	8.00 lbs of OC/hour; 40.00 lbs of OC/day from the use of gluing materials (see A.2.b)
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 percent 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.2.e)

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), 3745-21-07(G)(2), 3745-17-11(B)(1), and 3745-17-07(A).
- 2.b The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8

pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

- 2.c** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. 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 gluing material employed;
 - b. the number of hearses produced; and
 - c. the total emissions of OC for all gluing 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 hearses) = 6.36 lbs of OC/vehicle produced

2. The permittee shall calculate and record each month the total emissions of OC for all gluing materials employed [summation of the daily OC emission rates, from section C.1.c, for the calendar month, divided by 2000], in tons, for this emissions unit.
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 number of hearses produced; and
 - 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 hearses) = 0.45 lb of OC/vehicle produced

4. The permittee shall calculate and record the following information each month for emissions units R001 - R012 combined:
 - a. the total OC emissions for all gluing materials employed (summation of C.2 for R001 - R012, divided by 2000), in tons; and
 - b. the annual, year-to-date, OC emission rate for all autobody finishing materials employed (summation of C.4.a for each calendar month to date from January to December), in tons.

5. The permittee shall calculate and record the following information each month for emissions units K001 - K013, P001 - P004, and R001 - R012 combined:
 - a. the total OC emissions for all cleanup materials employed (summation of C.3.c above for R001 - R012 + summation of OC emissions from recordkeeping of cleanup operations for K001 - K015 and P001 - P004), in tons; and
 - b. the annual, year-to-date, OC emission rate for all cleanup materials employed (summation of C.5.a for each calendar month to date from January to December), in tons.

6. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 (C.6.b x C.6.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.6.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.6.e for all HAPs for all coatings, glues, autobody finishing materials, and cleanup materials), in lbs;

Accubuilt, Inc.

PTI Application: 03-17125

Issued: 10/3/2006

Facility ID: 0302020314

Emissions Unit ID: R012

- 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.
7. 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 - K013, P001 - P004, and R001 - R012:

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 16.32

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 3,027

MAGLC (ug/m3): 4, 476

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 21.78

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 135.2

MAGLC (ug/m3): 10,333

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 4.62

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 29.26

MAGLC (ug/m3): 14,048

Pollutant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 6.79

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 2,626

MAGLC (ug/m3): 10,333

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 29.66

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 451.6

MAGLC (ug/m3): 2,023

8. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. 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.
10. 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.
11. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the following:
- a. the actual annual OC emissions from the coating usage for emissions units R001 - R012 combined; and
 - b. the actual annual OC emissions from the use of cleanup materials from emissions units K001 - K013, P001 - P004, and R001 - R012 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);

- b. all exceedances of the monthly OC emission limitation of 2.00 tons (from the cleanup operations for emissions units K001 - K013, P001 - P004, and R001 - R012 combined), and the actual OC emissions for each such month;
- 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 - K013, P001 - P004, and R001 - R013 combined); and
- 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.c (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

3. The permittee shall submit semiannual written reports that (a) identify all days during which visible particulate emissions from the stack serving this emissions unit were observed, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. 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
8.00 lbs of organic compounds (OC)/hour from gluing operations

Applicable Compliance Method

Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation
40.00 lbs of OC/day from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation
7.30 tons of OC/year from gluing operations

Applicable Compliance Method

Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation
16.50 tons of OC/year for emissions units R001 - R012 combined from gluing operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.4.

- e. Emission Limitation
2.00 tons of OC/year from cleanup operations

Applicable Compliance Method

Compliance with the monthly allowable OC emission limitation shall be based on the record keeping requirements specified in section C.3.

- f. Emission Limitation
17.03 tons of OC/year for emissions units K001 - K013, P001 - P004, and R001 - R012 combined from cleanup operations

Applicable Compliance Method

Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.5.

- g. 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).

h. Emission Limitation

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

Applicable Compliance Method

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

i. Emission Limitation

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (R013) - Funeral Coach Vinyl Top Glue Station
(Modification of PTI #03-16228 issued on 09/23/04 to include synthetic minor HAP limits for purposes of avoiding MACT applicability and Title V permitting requirements)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Gluing Emissions: 7.30 tons of organic compounds (OC)/year; Cleanup Emissions: 125.60 lbs of OC/month; 0.75 ton of OC/year see A.2.a
OAC rule 3745-21-07(G)	8.0 lbs of OC/hour; 40.0 lbs of OC/day from the use of gluing materials (see A.2.b)
OAC rule 3745-17-08	None (see A.2.c)
OAC rule 3745-17-07(B)	None (see A.2.d)
OAC rule 3745-31-05(C)	Emissions of hazardous air pollutants (HAPs) shall not exceed 10.00 tons per year for an individual HAP or 25.00 tons per year for any combination of HAPs (see A.2.e)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-07(G)(2).
- 2.b The hourly OC emission limitation established by OAC rule 3745-21-07(G)(2) for this emissions unit cannot be exceeded since its potential to emit is less than 8 pounds per hour. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

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- 2.c** 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.d** Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- 2.e** 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 - K013, P001 - P004, 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.

B. Operational Restrictions

1. The permittee shall not employ and 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).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall calculate and record the following information each day for the gluing operations associated with this emissions unit:
 - a. the name and identification number of each gluing material employed;
 - b. the number of hearses produced;
 - c. the total OC emissions for all the gluing materials employed (C.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 hearses) = 12.72 lbs of OC/vehicle produced

2. The permittee shall collect and record each month the following information for this emissions unit:
 - a. the total OC emissions for all gluing materials employed, in tons (summation of the daily OC emission rates in section C.1.c for the calendar month, divided by 2000); and
 - b. the annual, year-to-date OC emission rate for all gluing materials employed (summation of C.2.a for each calendar month to date from January to December), in tons.
3. The permittee shall calculate and record the following information each month for the cleanup operations associated with this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of hearses produced;

- c. the total OC emissions for all cleanup materials employed ($C.3.b \times EFa^*$), 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 hearses) = 0.85 lb of OC/vehicle produced

- 4. The permittee shall collect and record the following HAP information each month for emissions units K001 - K013, P001 - P004, 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 ($C.4.b \times C.4.c$) for each individual HAP, in lbs;
 - 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 C.4.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.4.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.

5. 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):

Pollutant: Acetone

TLV (mg/m3): 1187.12

Maximum Hourly Emission Rate (lbs/hr): 4.00

Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 112.00

MAGLC (ug/m3): 28,221.57

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. 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.

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 40.00 pounds (from the use of gluing materials);
 - b. all exceedances of the monthly OC emission limitation of 125.60 lbs (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 - K013, P001 - P004, and R001 - R013 combined); and
 - 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.b (for emissions units K001 - K013, P001 - P004, and R001 - R013 combined).

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

E. 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

- a. 8.00 lbs of organic compounds (OC)/hour from gluing operations

- Applicable Compliance Method

- Compliance with the hourly OC emission limitation shall be assumed since the emissions unit's potential to emit is less than 8.00 lbs/hr (the potential to emit for this emissions unit was calculated by multiplying the emission factor of 9.61 lbs of OC/vehicle produced by the maximum number of vehicles produced).

- If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation

- b. 40.00 lbs of OC/day from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.1.

- c. Emission Limitation

- c. 7.30 tons of OC/year from gluing operations

- Applicable Compliance Method

- Compliance shall be demonstrated through the monitoring and recordkeeping requirements established in section C.2.

- d. Emission Limitation

- d. 125.60lbs of OC/month from cleanup operations

- Applicable Compliance Method

- Compliance with the annual combined OC emission limitation shall be based upon the record keeping requirements specified in section C.3.

- e. Emission Limitation

- e. 0.75 ton of OC/year from cleanup operations

- Applicable Compliance Method

- Compliance with the monthly allowable OC emission limitation specified in section C.3.

- f. Emission Limitation

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Emissions Unit ID: R013

Annual HAP emissions from emissions units K001 - K013, P001 - P004, 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 specified in section C.6 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.

F. Miscellaneous Requirements

None