

2 of 11 Pages

Facility Name: **Abra Auto body**

Application Number: **01-7411**

Date: **August 26, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

3 of 11 Pages

Facility Name: **Abra Auto body**

Application Number: **01-7411**

Date: **August 26, 1998**

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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after

4 of 11 Pages

Facility Name: **Abra Auto body**

Application Number: **01-7411**

Date: **August 26, 1998**

commencement of operation.

SOURCE OPERATION 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 permit and all applicable air pollution laws and regulations.

Facility Name: **Abra Auto body**Application Number: **01-7411**Date: **August 26, 1998**AIR EMISSION SUMMARY

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001	Paint Booth	Compliance with permitted limits and applicable rules and the Air Toxics Policy. Use of Wet scrubber. See Section A. Operational Restrictions	3745-31-05 3745-21-09 (U)(2)(c) 3745-17-11 3745-17-07 (A)(1)	7.0 lbs VOC/hr 2.7 tons VOC/yr See Additional Special Terms and Conditions 0.005 lbs PM/hr 0.02 tons PM/yr Visible particulate Emissions shall not Exceed 20% opacity as a six average except as provided by rule.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	2.7
PM	0.02

6 of 11 Pages

Facility Name: **Abra Auto body**

Application Number: **01-7411**

Date: **August 26, 1998**

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Central District Office, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.**

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

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

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

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not

cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. Source K001 shall not employ any coatings with a VOC content greater than 5.9 lbs. VOC per gallon.
2. Source K001 shall not employ any clean-up material with a VOC content greater than 6.69 lbs. VOC per gallon.

B. Recordkeeping Requirements for Surface Coating

1. The permittee shall collect and record the following information each month for the sources K001:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied; and,
 - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the number of gallons (excluding water and exempt solvents) of each coating employed; and,
 - e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

C. Reporting Requirements for Surface Coating

1. The permittee shall notify the Director of any monthly record showing the exceedance of a permitted emission limit.

Facility Name: **Abra Auto body**

Application Number: **01-7411**

Date: **August 26, 1998**

2. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of 5 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 the permit. Such records may be maintained in computerized form.

3. The permittee shall submit required reports in the following manner:

a. reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA Central District Office; and,

b. 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 record keeping 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 Ohio EPA Central District Office. 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.)

D. Toxics Policy Requirement

This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 01-7411. In conjunction with the best available technology requirements of OAC rule 3745-15-05, the VOC emission limitations specified in this permit were established in accordance with the Ohio EPA's *Air Toxics Policy* and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's *Air Toxics Policy* was demonstrated for each pollutant based on the Screen2C model and a compared with the predicted 1 hour maximum ground-level concentration (MAGLC). The following summarizes the results

of the modeling for the VOCs:

Pollutant: Toluene

TLV: 288mg/m³

Maximum Hourly Emissions Rate: 0.883 gm/sec or 7.0 lbs/hour.

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line: <6.8ug/m³

Maximum Acceptable Ground-Level Concentration (MAGLC): 6857.1ug/m³

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Central District Office are required, including the possible issuance of the modifications to PTI number 01-7411 and the operating permit:

1. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 as specified in the above table;
2. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
3. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
4. any change in composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
5. Any change in the composition of the coatings or cleanup materials, or the use of coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

E. Testing

Facility Name: **Abra Auto body**

Application Number: **01-7411**

Date: **August 26, 1998**

1. Compliance with the emissions limitations contained in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
7 lbs VOC/hr

Applicable Compliance Method:
(1.2 gallons/hour) * (5.9 lbs VOC/ gallon)

The pounds per hour limitation is based on Abra Auto Body's maximum coating capacity. The maximum emissions passed the Air Toxic Policy, therefore, no hourly recordkeeping is necessary.

- b. Emission Limitation:
2.7 tons VOC/year

Applicable Compliance Method:
Compliance shall be determined by the record keeping requirements specified in Section B of the terms and conditions.

- c. Emissions Limitation:
5.9 lbs VOC/gallon excluding water and exempt solvents for coating material and 6.69 lb VOC/gallon for any cleanup material employed.

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

- d. Emission limitation:
0.005 lbs Particulate emissions/hour

Applicable Compliance Method:
Use of wet scrubber during all periods of spray booth operation. To determine the actual worst case emissions rate for particulate matter from the emissions unit K001, the following equation shall be used:

$E = \text{maximum coating solids usage rate (pounds/hour)}$

11 of 11 Pages

Facility Name: **Abra Auto body**

Application Number: **01-7411**

Date: **August 26, 1998**

$$*(1-TE) * (1-CE)$$

Where:

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency of painting equipment in decimal form (use 0.60), transfer efficiency is the ratio of the amount of coating solid deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment in decimal form (use 99.5% for the wet scrubber)