



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
COSHOCTON COUNTY
Application No: 06-05929**

CERTIFIED MAIL

DATE: 2/16/00

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

Dorseys Reconditioning inc
Patrick Dorsey
2479 S Lawn
Coshocton, OH 43812

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
West Virginia

SEDO



Permit To Install

Issue Date: To be entered upon final issuance

Terms and Conditions

Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 06-05929

Application Number: 06-05929

APS Premise Number: 0616010084

Permit Fee: **To be entered upon final issuance**

Name of Facility: Dorseys Reconditioning inc

Person to Contact: Patrick Dorsey

Address: 2479 S Lawn
Coshocton, OH 43812

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1957 S Sixth St
Coshocton, Ohio**

Description of proposed emissions unit(s):

Coating/paint booth.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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 Related to Monitoring and Recordkeeping 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 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 thirty (30) 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.

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Issued: To be entered upon final issuance

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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>
VOC	29.4
HAPs	9.99

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Painting/Coating Booth	OAC rule 3745-35-07 (B) and OAC 3745-31-05 (D) (Synthetic Minor to avoid MACT and Title V)	9.99 TPY of all Hazardous Air Pollutants (HAPs) as a 12-month rolling summation 29.4 TPY VOC as a 12-month rolling summation See II.B.1. and 2.
	OAC rule 3745-21-09 (U)(1)(d)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit
	OAC rule 3745-31-05 (A)(3)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit. 630 lb VOC/hr 29.4 TPY VOC Compliance with the Air Toxics Policy See II.A.2.a.

2. **Additional Terms and Conditions**

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

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed the following, based upon a rolling, 12-month summation of the coating usage figures:
 - i. a total of 13,500 gallons, as employed, of coating #1 - Protecto 401;
 - ii. a total of 1,000 gallons, as employed, of coating #2 - T-140-1211;
 - iii. a total of 1,000 gallons, as employed, of coating #3 - 46 H 413, and
 - iv. a total of 650 gallons of Blend # 9330-CP-20 clean-up solvent.

Alternative coatings with a lower VOC/HAP content may be substituted upon written approval from the Ohio EPA-Southeast District Office.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>			
	<u>Coating #1</u>	<u>Coating#2</u>	<u>Coating#3</u>	<u>Clean-up</u>
1	1125	84	84	55
1-2	2250	168	168	110
1-3	3375	252	252	164
1-4	4500	336	336	218
1-5	5625	419	419	272
1-6	6750	502	502	326
1-7	7875	585	585	380
1-8	9000	668	668	434
1-9	10125	751	751	488
1-10	11250	834	834	542
1-11	12375	917	917	596
1-12	13500	1000	1000	650

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each change evaluated pursuant to the Air Toxic Policy Provision of this permit to install:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of the evaluation and determination that the changed emissions unit(s) still satisfies the Air Toxic Policy Provision of this permit to install; and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the evaluation of the air toxic policy provision of this permit to install for the change.
2. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, thinner, and cleanup material employed;
 - b. The VOC content of each coating (excluding water and exempt solvents), thinner, and cleanup material, in pounds per gallon;
 - c. The total HAP content of each coating, thinner, and cleanup material, in pounds per gallon;
 - d. The number of gallons of each coating, thinner and cleanup material employed;
 - e. The total VOC emissions (VOC applied) from all coatings, thinners, and cleanup materials employed [the sum of (1.b times 1.d divided by 2000 lb/ton) for all coatings, thinners, and cleanup materials], in tons;
 - f. The total HAP emissions (HAP applied) from all coatings, thinners, and cleanup materials employed [the sum of (1.c times 1.d divided by 2000 lb/ton) for all coatings, thinners, and cleanup materials], in tons;
 - g. The rolling, 12-month summation of the total HAP emissions, in tons;
 - h. The rolling, 12-month summation of the VOC emissions, in tons, and
 - i. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation of the gallons of each coating, thinner and clean-up material employed. Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

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3. The permittee shall submit quarterly reports which include the following information:
 - a. the total number of gallons of each coating, thinner and clean-up material employed in this emissions unit for each calendar month and each rolling 12-month period;
 - b. The total HAPs emissions from the coatings, thinners, and cleanup materials employed in this emissions unit, in tons, for each calendar month and each rolling, 12-month period.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include information for each month during the previous calendar quarter.

4. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission Limitation:

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings.

2. Emission Limitation:

9.99 TPY of all Hazardous Air Pollutants (HAPs) as a rolling 12-month summation

Compliance Method:

Compliance with the rolling, 12-month emission limitations for all HAPs shall be determined in accordance with the following method:

Formulation data shall be used to determine the HAP and individual air toxics contents of the coatings, thinners, and cleanup materials. The HAP emission rates for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of material employed by the appropriate HAP content determined for that material. The total HAP emission rate for each month shall be calculated by adding the emission rates and usage rates for all coatings, thinners, and cleanup materials employed during the month. The rolling, 12-month summations for total HAPs shall be calculated each month by adding the HAP emission rate for that month to the HAP emission rate for the previous 11 calendar months (this same method shall be used to calculate rolling, 12-month usage).

3. Emission Limitation:

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630 lb VOC/hour

Compliance Method:

Compliance with the 630 pounds VOC per hour emission limit shall be demonstrated by a one time calculation multiplying the maximum number of gallons of coating that can theoretically be applied per hour in this emissions unit (based on the maximum design capacities of the spray gun) times the highest VOC content coating. No additional record keeping is necessary to demonstrate compliance with this limit because the limit cannot be exceeded under current conditions.

4. Emission Limitation:

29.4 TPY VOC/9.99 TPY HAPs

Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC and HAPs content of the coatings, thinners, and cleanup materials. The VOC and HAPs emission rate for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of material employed by the appropriate VOC or HAP content determined for that material.

5. Compliance with the air toxics requirements have been determined by modeling the maximum total emission rate for this emissions unit to determine the predicted 1-hour maximum ground-level concentration at the fence line. Therefore, the hourly emission rates can not be exceeded under current conditions. As required above and by OAC rule 3745-31-02, any change in the coatings used or in the operation of the emissions units which would increase the emission rate of any individual air toxic would require a new permit to install.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable:
A(1) - emission limitations established pursuant to OAC rule 3745-35-07 (B), OAC rule 3745-31-05 (D) and OAC rule 3745-21-09 (U)(1)(d);
B;
C(2);
D; and
E(1), (2) and (4).
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for the emissions units. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions

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units' exhaust systems, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the ISCST3 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant:

Pollutant: Xylene

TLV (ug/m³): 434,000 ug/m³

Maximum Hourly Emission Rate (lbs/hr): 258 pounds/hour

Predicted 1-Hour Maximum off-site Ground-Level Concentration (ug/m³): 9297 ug/m³

MAGLC (ug/m³): 10333 ug/m³

Physical changes or changes in the method of operation of any emissions unit identified in this permit to install that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this potential noncompliance situation, prior to initiating any changes to any emissions unit identified in this permit to install, the permittee is required to conduct an evaluation as specified below to determine that the "Air Toxic Policy Provision" of this permit to install is still satisfied. Changes that can affect the "Air Toxic Policy Provision" include, but are not limited to, 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 any emissions unit identified in this permit to install or exhaust parameters specified in the permit to install application (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in this permit to install; and
- c. prior to the change, the permittee conducts an evaluation pursuant to the Air Toxic Policy

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provision of this permit to install, determines that the changed emissions unit still satisfies the air toxic policy provision of this permit to install, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy Provision for the change.

For any change to any emissions unit identified in this permit to install or its method of operation that either would 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, the permittee shall obtain a final permit to install prior to the change.

This provision is superseded upon the promulgation by US EPA of a National Emission Standard for Hazardous Air Pollutants (NESHAP) applicable to any of the operations addressed in this permit