



Division of Air Pollution Control

Submission of this form constitutes notice that the party identified in Section I of this form intends to be authorized to install/operate a source of air pollution according to the permit-by-rule provisions of OAC 3745-31-03(C)(1) and (C)(2)(f). By submitting this form, the applicant agrees to operate and maintain the facility and equipment in accordance with the applicable permit-by-rule provisions. An original signature is needed, and forms transmitted by fax will not be accepted. Complete all information as indicated by the instructions.

I. Applicant Information / Mailing Address

Company (Applicant) Name: \_\_\_\_\_

Mailing (Applicant) Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_

II. Facility / Site Location Information

Facility Name: \_\_\_\_\_

Facility Address / Location: \_\_\_\_\_ County: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Facility Contact: \_\_\_\_\_ Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_

Ohio EPA Facility ID Number (10-digit) if known - See Instructions: \_\_\_\_\_

III. Reason for Submitting Notification:

- Initial request, Equipment modification, Ownership change, Request for revocation of current permit - See Instructions and complete additional information below

Permit to install (PTI) or Permit to operate (PTO) number \_\_\_\_\_

Emission Unit ID (4-digit) \_\_\_\_\_

IV. Painting Operations Information - See Instructions

- Does the facility use less than 3,000 gallons of all paints, solvents and other coatings per year?
Does the facility do less than 50 jobs per week?
Does the facility use HVLP or electrostatic spray equipment for all paints and coatings applied by spraying?

V. Spray Booth Information - See Instructions

- Does the facility have two or less spray booths for painting?
Are all painting operations performed as described in OAC paragraph 3745-31-03(C)(2)(f)(i)(d)?
Does each spray booth stack discharge vertically to the atmosphere without any obstruction?
Is each booth's exhaust fan rated at or above 10,000 CFM (cubic feet per minute)?
Does each spray booth stack meet the height and location requirements found in OAC paragraph 3745-31-03(C)(1)(f)(i)(f)(iii)?

I certify under penalty of law that all statements or assertions of fact made in this notification are true and complete, and shall subject the signatory to liability under state laws forbidding false or misleading statements.

Applicant Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

RETAIN A COPY OF THIS FORM FOR YOUR RECORDS

Mail the original, signed form to the appropriate Air Permit Review Agency for your county. (Please refer to the "Air Permit Review Agency" map in the attached instructions for mailing address). Rev 2/22

For Ohio EPA Use Only:

FAC ID: \_\_\_\_\_ Date received \_\_\_\_\_

# INSTRUCTIONS: Permit-by-Rule Supplemental Form Auto Body Refinishing Facility

## GENERAL INSTRUCTIONS:

Provide complete responses to all applicable questions. Submittal of an incomplete form will delay review and processing. If you need assistance, contact your Ohio EPA District Office or Local Air Agency for assistance. Contact the Ohio EPA, Division of Air Pollution Control at (614) 644-2270 for more information on contacting your local district office or go to <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/ohio-epa-district-offices-and-local-air-pollution-control-agencies> and select the office that covers your facility's location. For more information on the permit-by-rule process, including online tracking of your notification form, go to <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/permitting/permit-by-rule-pbr>.

This is a notification form for an auto body refinishing facility which is intended to be installed and/or operated according to the permit-by-rule provisions of OAC 3745-31-03. "Auto body refinishing facility" means a facility engaged primarily in collision repair and refinishing of automobiles and light duty trucks. Automobile "paint-only" and customizing facilities, which are engaged in repainting used motor vehicles and light duty trucks but do not perform collision repair work, are also included in this definition. Mobile auto body painting operations, which employ temporary spray booths meeting the design criteria specified by the permit-by-rule, are also included in this definition.

The permit-by-rule (PBR) provision is intended to cover all equipment and operations (spray booths, gun cleaning equipment, paint mixers, etc.) which are part of the auto body repair and finishing processes. It does not cover other types of air pollution sources at the facility such as solvent recycling units, solvent parts washers, fuel-fired boilers and heaters that may require separate air pollution permits. For a copy of this regulation, contact your Ohio EPA District Office or Local Air Agency or go to <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/regulations>.

- I. Check the appropriate Yes/No boxes based on actual or projected production data. Combined annual usage of all paints, solvents, diluents, catalysts, primers, surfacers, or any other VOC-containing material must not exceed 3,000 gallons per year. A "job" means the total area or areas to be refinished or repainted on an automobile or light duty truck by an auto body refinishing facility. "HVLP" means High Volume, Low Pressure spray equipment that operates at a maximum air pressure of ten (10) pounds per square inch gauge (psig) as measured at the nozzle. Electrostatic spray equipment uses an apparatus which imparts a positive electrical charge to the atomized paint stream which adheres to the negatively charged (grounded) part being painted. **Please note that answering "No" to any question disqualifies the facility from the PBR.**
- II. Check the appropriate Yes/No boxes based on actual data or design specifications. Consult the spray booth manufacturer or installation contractor for this information. A dry filtration system consists of a bank of filters (paper, fiberglass, or other media) used to prevent paint overspray from being emitted through the exhaust stack. A water wash system employs a water spray or curtain to remove paint overspray from the exhaust stream. Spray booth stacks must discharge vertically to the atmosphere and not have an obstruction, such as a goose neck, rain cap, or other object which impedes the upward vertical flow of the exhaust. The distance from ground level to the top of all spray booths stacks must be at least 16 feet. Consult the fan manufacturer for the fan rating in CFM (cubic feet per minute) or ACFM (actual cubic feet per minute). **Please note that answering "No" to any question disqualifies the facility from the PBR.**

**Signature Requirements** – This notification will be deemed incomplete if it is not signed by the appropriate signatory. Please see the following guidance at [https://ohioepa.custhelp.com/app/answers/detail/a\\_id/1200](https://ohioepa.custhelp.com/app/answers/detail/a_id/1200) for more information on who is authorized to sign this form or contact your Ohio EPA District Office or Local Air Agency.

## **Permit-by-Rule Requirements: Auto Body Refinishing Facility**

*Excerpts from applicable sections of Ohio Administrative Code 3745-31-03 are included with these Instructions for convenience. An owner or operator of an auto body refinishing facility which intends to install and/or operate according to the permit-by-rule provisions must comply with all applicable requirements specified in paragraphs (C)(1) – General Provisions, and (C)(2)(f) – Auto body refinishing facility.*

### **(C) Permit-by-rule.**

The following air contaminant sources may elect to be permitted under this paragraph in lieu of the requirement to obtain a permit-to-install or PTIO under rule 3745-31-02 of the Administrative Code. These permits-by-rule are valid only as long as the owner or operator complies with all of the permit-by-rule general provisions, meets the qualifying criteria defined in the applicable permit-by-rule and complies with all of the requirements under the applicable permit-by-rule specific provisions. Upon request by the director, the owner or operator of a facility that has exceeded the permit-by-rule thresholds or that the director finds is causing or may cause a public nuisance in violation of rule 3745-15-07 of the Administrative Code shall submit an application for a permit-to-install or PTIO.

These permits-by-rule do not, however, exempt any air contaminant source from requirements of the Clean Air Act, including being considered for purposes of determining whether a facility constitutes a major source or is otherwise regulated under Chapter 3745-77 of the Administrative Code or any requirement to list significant or insignificant activities and emission levels in a Title V permit application. In addition, this rule does not relieve the owner or operator from the requirement of including the emissions associated with these sources into any major NSR permitting action.

## **(1) General provisions.**

These general provisions apply to all owner or operators who are utilizing one or more of the permits-by-rule listed in paragraph (C) of this rule.

### **(a) Recordkeeping requirements.**

The owner or operator shall collect and maintain the records described for each air contaminant source electing to be permitted under paragraph (C) of this rule and these records shall be retained in the owner or operator's files for a period of not less than five years, unless otherwise specified in each permit-by-rule. These records shall be made available to the director or any authorized representative of the director for review during normal business hours.

### **(b) Notification requirements for new installations.**

For the purposes of this paragraph, a new permit-by-rule air contaminant source is an air contaminant source installed after the promulgation date of any new applicable permit-by-rule or July 29, 2005, whichever comes later. The owner or operator of a new permit-by-rule air contaminant source electing to use an applicable permit-by-rule shall submit a written notification in a form and manner prescribed by the director prior to installation of the air contaminant source. This notification, or form, shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency, and shall contain the following information, at a minimum:

- (i) The owner or operator's and the facility contact's name.
- (ii) The facility mailing address and telephone number.
- (iii) The location of the air contaminant source.
- (iv) A description of the air contaminant source, including any pollution control.
- (v) A statement by the owner or operator that indicates which permit-by-rule applies to the air contaminant source.

### **(c) Notification requirements for existing permitted sources.**

The owner or operator of an air contaminant source which is operating under an existing permit-to-install, PTIO or permit-to-operate may continue to operate in compliance with that permit or may submit a written request to the Ohio environmental protection agency to revoke any such individual permit or permits and to allow the air contaminant source to operate under the permit-by-rule provisions. The director may revoke a permit-to-install, PTIO or permit-to-operate if the permittee requests revocation, agrees to meet all permit-by-rule qualifying and operating conditions, and the director determines that the revocation will not result in the violation of any applicable laws. When a permittee requests a revocation pursuant to this paragraph, the director, without prior hearing, shall make a final determination on the request and inform the permittee in writing. If the director agrees with the request to operate under the permit-by-rule, then the permit-by-rule becomes applicable to the permittee on the date the existing permit-to-install, PTIO or permit-to-operate are revoked.

### **(d) Notification requirements for existing permit-by-rule sources.**

The owner or operator of an air contaminant source that is operating under one of the permit-by-rules that existed prior to July 29, 2005 (emergency electrical generators, injection and compression molding, crushing and screening plants, soil-vapor extraction and soil-liquid extraction) and desires to continue operating under the permit-by-rule shall submit a written notification which contains all of the elements required in paragraph (B)(1)(b) of this rule. This notification shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency and shall be submitted by July 29, 2006.

### **(e) Records retention requirements.**

Each record of any monitoring data, testing data, and support information required pursuant to a specific permit-by-rule 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 the specific permit-by-rule. Such records may be maintained in computerized form.

### **(f) Reporting requirements.**

The owner or operator shall submit required reports in the following manner:

- (i) Reports of any monitoring or recordkeeping information required by a specific permit-by-rule shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency.
- (ii) Except as otherwise may be provided in a permit-by-rule specific reporting requirements paragraph of a specific permit-by-rule, a written report of any deviations (excursions) from emission limitations, operational restrictions, qualifying criteria, and control equipment operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in the permit-by-rule shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency within thirty days of the date the deviation occurred. The report shall describe the specific limitation or operational restriction exceeded, the probable cause

of such deviation, and any corrective actions of preventive measures that have been or will be taken.

(g) Scheduled maintenance/malfunction reporting.

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of rule 3745-15-06 of the Administrative Code. The malfunction of any air contaminant source or any associated air pollution control system shall be reported to the appropriate Ohio environmental protection agency district office or local air agency in accordance with paragraph (B) of rule 3745-15-06 of the Administrative Code. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system shall be accompanied by the shutdown of the air contaminant source that is served by such control system.

**(2) Source Specific provisions.**

**(f) Auto body refinishing facility permit-by-rule.**

(i) Qualifications.

An auto body refinishing facility that meets all of the following qualifications is eligible to use this permit-by-rule:

- (a) The facility has two or fewer paint spray booths used for painting.
- (b) The facility does not do more than fifty jobs per week.
- (c) The facility does not use more than three thousand gallons combined of all coatings, solvents, and other volatile organic compound (VOC) containing materials in any calendar year.
- (d) The facility performs all painting operations in enclosed spray booth(s) which are designed to confine and direct the paint overspray, fumes, and vapors to a powered ventilation system and are equipped with either a dry filtration or water wash system(s) to capture paint overspray.
- (e) The facility applies any paint or coatings by one of the following means; high volume low pressure (HVLP) spray equipment, or electrostatic application equipment.
- (f) The exhaust stack(s) of each paint spray booth at the facility:
  - (i) Is equipped with a fan designed to achieve an exhaust flow capacity of at least ten thousand cubic feet per minute.
  - (ii) Discharges air contaminants in a vertical direction, without obstructions like rain caps, goose neck exhaust, or other obstructions.
  - (iii) Has a stack height which is seventeen feet or greater, as measured from ground level to the point of discharge to the atmosphere; or has a stack height which is at least sixteen feet, but less than seventeen feet, as measured from ground level to the point of discharge to the atmosphere and has a point of discharge no closer than sixty feet to the nearest facility property line.
- (g) When applicable, the facility complies with 40 CFR part 63, subpart HHHHHH, the national emission standards for hazardous air pollutants for paint stripping and miscellaneous surface coating operations.

(ii) Applicable emissions limitations and/or control requirements.

- (a) The applicable rules, emissions limitations and control requirements that apply to the facility subject to this permit-by-rule are defined in the following table:

Applicable Rule(s)	Applicable Emissions Limitations/Control Requirements
Paragraph (A)(3) of rule 3745-31-05 of the Administrative Code	Facility emissions of VOC and combined hazardous air pollutants (HAP) shall not exceed 9 pounds per hour and 11.7 tons per year. Facility emissions of a single HAP shall not exceed 4.5 pounds per hour and 5.85 tons per year.
Paragraph (U)(1) of rule 3745-21-09 of the Administrative Code	This operation is exempt from the requirements of this rule pursuant to paragraph (U)(2)(c) of rule 3745-21-09 of the Administrative Code.
Rule 3745-21-18 of the Administrative Code	The provisions of this rule are only applicable to facilities located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, Warren, Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit counties.
40 CFR part 63, subpart HHHHHH (refer to regulation for applicability)	Requirements for minimizing emissions from coating and stripping operations, capture efficiency, cleanup, storage and

(iii) Operational requirements.

- (a) The owner or operator of the facility shall regularly maintain the spray painting application equipment, exhaust filtration systems, and spray booths in accordance with the recommended procedures and maintenance intervals of the respective manufacturers in order to minimize air contaminant emissions.
- (b) Paint application equipment shall be cleaned using one or more of the following means:
  - (i) In a device that remains closed at all times when not in use.
  - (ii) In a system that discharges non-atomized cleaning solvent into a waste container that remains closed when not in use.
  - (iii) In a reservoir that allows for disassembly and cleaning of application equipment and that is kept closed when not in use.
  - (iv) In a system that atomizes cleaning solvent into a waste container that is fitted with a device designed to capture atomized solvent emissions and prevent mist and paint residue from being emitted outside of the collection container.
- (c) If a water wash system is employed to control paint overspray, the facility shall comply with all applicable laws pertaining to the handling, treatment, or discharge of waste water.
- (d) For facilities located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, Warren, Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage and Summit counties, the paint owner or operator shall:
  - (i) Not apply to mobile equipment or mobile equipment components any automotive pretreatment, automotive primer-surfacer, automotive primer-sealer, automotive topcoat, or automotive specialty coatings, including any VOC-containing materials added to the original coating supplied by the manufacturer, that contain VOCs in excess of the limits specified in the following table:

Table: Allowable content of VOCs in mobile equipment repair and refinishing coatings, as applied (in weight of VOC per volume of coating, excluding water and non-VOC or exempt solvents)

Coating Type	Limit (pounds VOC per gallon of coating, excluding water and exempt solvents)	Limit (grams VOC per liter of coating, excluding water and exempt solvents)
Pretreatment primer	6.5	780
Primer-surfacer	4.8	575
Primer-sealer	4.6	550

Table: Allowable content of VOCs in mobile equipment repair and refinishing coatings, as applied (in weight of VOC per volume of coating, excluding water and non-VOC or exempt solvents)

Topcoat (single-stage)	5.0	600
Topcoat (two-stages basecoat/clearcoat)	5.0	600
Topcoat (three or four-stage basecoat/clearcoat)	5.2	625
Multi-colored topcoat	5.7	680
Automotive specialty	7.0	840

- (ii) Calculate the VOC content of the coatings employed in accordance with the following:

(A) Except for multi-stage topcoats, the mass of VOC per combined volume of VOC and coating solids, excluding water and exempt solvents, shall be calculated by the following equation:

$$VOC = \frac{W_v - W_w - W_{ec}}{V - V_w - V_{ec}}$$

Where:

- VOC = VOC content in pounds per gallon of coating, excluding water and exempt solvents;
- $W_v$  = mass of total volatiles, in pounds;
- $W_w$  = mass of water, in pounds;
- $W_{ec}$  = mass of exempt solvents, in pounds;

V = volume of coating, in gallons;  
V<sub>w</sub> = volume of water, in gallons; and  
V<sub>ec</sub> = volume of exempt solvents, in gallons.

(B) The VOC content of a multi-stage topcoat shall be calculated by the following equation:

$$VOC_{multi} = \frac{VOC_{bc} + \sum_{i=0}^M VOC_{mci} + 2(VOC_{cc})}{M + 3}$$

Where:

VOC<sub>multi</sub> = VOC content of multistage topcoat, in pounds per gallon, excluding water and exempt solvents;  
VOC<sub>bc</sub> = VOC content of basecoat, in pounds per gallon, excluding water and exempt solvents;  
VOC<sub>mci</sub> = VOC content of each midcoat(s), in pounds per gallon, excluding water and exempt solvents;  
VOC<sub>cc</sub> = VOC content of the clear coat, in pounds per gallon, excluding water and exempt solvents; and  
M = number of midcoats.

(The VOC content of each coating shall be measured in accordance with USEPA method 24.)

(C) Train the operators of paint application equipment in the use of a high volume low pressure (HVLP) sprayer, or electrostatic spray airless spray gun, or air-assisted airless spray gun equipment in accordance with the manufacturer's specifications, and the handling of a coating and any solvents used to clean the spray equipment, including procedures used to reduce emissions from evaporation and overspray.

(D) Store the following materials in non-absorbent, non-leaking containers and keep these containers closed at all times when not in use: fresh coatings, used coatings, solvents, VOC-containing additives and materials, VOC-containing waste materials, and cloth, paper, or absorbent applicators moistened with any of the items listed above.

(e) When applicable, a facility located in any county in Ohio must also comply with the booth specifications, stripping management practices, overspray capture efficiency, spray gun specifications, solvent storage, and training requirements of 40 CFR part 63, subpart HHHHHH.

(iv) Monitoring and/or recordkeeping requirements.

(a) The owner or operator of the facility shall maintain annual records which list the following information for each VOC-containing material (coatings, thinners, reducers, surfacers, clean-up solvents, etc.) used or purchased by the facility in each calendar year:

- (i) The name and identification number of each material.
- (ii) The quantity of each material used or purchased, in gallons.
- (iii) The volatile organic compound (VOC) content of each material, in pounds per gallon.
- (iv) The total volume, in gallons, of all VOC-containing materials used or purchased.

(b) The owner or operator of the facility shall maintain a record of the number of jobs performed per week.

(c) The owner or operator of the facility shall maintain documentation which demonstrates each exhaust stack complies with the design requirements listed in paragraph (C)(2)(f)(i)(f) of this rule.

(d) For facilities located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, Warren, Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit counties, the owner or operator shall submit documentation sufficient to demonstrate that all employees applying coatings are properly trained in the use of a high volume low pressure (HVLP) sprayer, electrostatic spray, airless spray gun, or air-assisted airless spray gun and in the handling of a coating and any solvents used to clean the spray equipment. The owner or operator shall maintain a copy of this documentation on-site and make the documentation available to the Ohio environmental protection agency upon request.

(e) When applicable, a facility located in any county in Ohio must also comply with the monitoring, recordkeeping, and reporting requirements of 40 CFR part 63, subpart HHHHHH.

(v) Testing requirements.

- (a) Compliance with the annual material usage limitation shall be based upon the record keeping requirements specified in paragraph (C)(2)(f)(iv)(a) of this rule.
- (b) Compliance with the hourly VOC/combined HAP emission limitation is based on multiplying the maximum of one job per hour by a maximum emission factor of nine pounds VOC/combined HAP per job. Compliance with the hourly single HAP emission limitation is based on multiplying the maximum of one job per hour by a maximum emission factor of 4.5 pounds single HAP per job.
- (c) Compliance with the annual tons per year VOC/combined HAP emission limitation is based on multiplying the maximum number of jobs per week, fifty, by an emission factor of nine pounds VOC/combined HAP per job by fifty-two weeks per year and dividing by two thousand pounds per ton. Compliance with the annual tons per year single HAP emission limitation is based on multiplying the maximum number of jobs per week, 50, by an emission factor of 4.5 pounds single HAP per job by fifty-two weeks per year and dividing by two thousand pounds per ton.