

1st STOP CHECKLIST: MOTOR VEHICLE REPAIR

REQUIREMENTS & REGULATIONS

This includes motor vehicle garage and service station mechanical equipment (e.g., gasoline pumps, hoists and installation).

- [] Auto repairs are regulated by **Ohio's Auto Repairs and Services Law**. Please read the attached information from the **Ohio Attorney General's Office**. If you have questions, contact the Ohio Attorney General's Office at **(800) 282-0515 or (614) 466-4320**. Information can also be found on-line at <http://www.ohioattorneygeneral.gov/>.
****Remember to check local government agencies.****
- [] Motor vehicle collision repair shops must be registered with the **Ohio Board of Motor Vehicle Collision Repair**. *A motor vehicle collision repair shop is any motor vehicle repair business that does **more than five** collision repairs in a calendar year.* Contact the board at **(614) 995-0714**. Information and registration forms are also available on-line at www.collisionboard.ohio.gov/. ****Remember to check local government agencies.****
- [] Motor vehicle repair shops must charge sales tax on repairs. If you have a **storefront**, or **mobile or on-site** vehicle repair, you need a **VENDOR'S LICENSE** from YOUR COUNTY AUDITOR or Information is also on-line at <http://business.ohio.gov>.
- [] If you will sell tires, contact the **OHIO DEPARTMENT OF TAXATION** for information about tire fees.
- [] Contact the **OHIO DEPARTMENT OF TAXATION** at **(888) 405-4039 for Business Tax Assistance; (888) 405-4089 for Tax Registration; or (800) 282-1782 for the Forms Request Line**. Information is also on-line at <http://tax.ohio.gov>.
- [] Contact the **Ohio Environmental Protection Agency (EPA)** for information about the proper disposal of hazardous and solid waste. The EPA can be reached at **(614) 644-3020 for General Inquiries or (800) 329-7518 for Office of Compliance Assistance and Pollution Prevention**. The Ohio EPA is also on-line at www.epa.state.oh.us.
****Remember to check local government agencies.****
- [] If you will provide towing services, you may need a commercial driver's license. It depends on the size of the vehicle you will drive and the weight you will tow. Contact the **Ohio Bureau of Motor Vehicles** at **(614) 752-7500** for more information. Information and registration forms can also be found on-line at www.bmv.ohio.gov.
****Remember to check local government agencies.****

Permit-by-Rule User's Guide for Auto Body Refinishing



Office of Compliance Assistance and
Pollution Prevention

October 2007

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Introduction

The purpose of this user's guide is to provide the auto body refinishing industry with information and guidance on the proper use of the air pollution permit-by-rule (PBR) provisions specified by Ohio Administrative Code **3745-31-03(A)(4)(g)**. These provisions exempt painting operations at small auto body refinishing shops from permits to install and permits to operate, but do require compliance with the appropriate requirements specified in the PBR provisions.

Disclaimer:

This guide is intended to be a tool to help auto body refinishing shops understand and comply with the PBR provisions. It **does not** include a comprehensive listing of all environmental regulations that may be applicable to an auto body refinishing shop. A comprehensive listing would be dependent on regulatory and business specific factors which are beyond the scope of this guide. This guide discusses the specific PBR provisions for air pollution permitting exemptions under the PBR regulations and further company research on requirements not covered by this guide, such as for hazardous waste disposal, may be necessary. Use of this guide is not a guarantee that a company meets all applicable state and federal regulations. It is a tool to be used only for understanding the PBR provisions.

What is a permit-by-rule (PBR)?

A permit-by-rule (PBR) is a specific permit exemption that may be used to exempt an air pollution source, such as a paint booth, from the traditional air pollution permit process. It does not, however, exempt the pollution source from applicable air pollution regulations and compliance requirements.

The PBR for auto body refinishing shops contains qualifying criteria, emission limitations, conditions for operation, and requirements for recordkeeping and reporting. A company must continually meet all the PBR criteria to qualify for the PBR. Ohio EPA retains the authority to revoke a company's ability to operate a paint booth under the PBR and to require the company to obtain a traditional air pollution permit.

How does a PBR differ from an ordinary permit?

Under traditional air permitting regulations, many air pollution sources, such as paint booths, must obtain individual air pollution permits from Ohio EPA. A permit-to-install (PTI) is required before installing the air pollution source or booth. Once the PTI is issued and prior to its expiration, a renewable permit-to-operate (PTO) must be obtained for continued operation of the booth after installation. An individual PTI and PTO are required for each source or booth.

The PBR exempts these air pollution sources from the PTI and PTO process and functions as both the installation and operating permit for the source or booth(s). However, the shop operator must continually meet all of the PBR criteria. If the shop can no longer comply with the conditions of the PBR, the company must apply for a traditional PTI and/or PTO. The PBR is an option, and the shop operator can elect to get traditional permits instead.

What are the benefits of a PBR?

Since auto body refinishing shops qualifying for PBRs are exempt from obtaining a PTI, installation of new equipment can be expedited and completing complex permit applications is avoided. In addition, there are no Ohio EPA permit fees assessed under the PBR program.

The PBR puts all air pollution requirements in one place. The PBR also contains simplified record-keeping and reporting requirements as compared to traditional permits.

Can an auto body refinishing shop that is operating a paint booth according to an existing PTI or PTO switch to the PBR?

Yes. The shop must submit a written request to Ohio EPA to revoke the affected permits and must agree to meet all qualifying and operating conditions of the PBR. Ohio EPA will then make a final written determination on the request. If approved, the company can begin operating according to the PBR on the date the existing PTI and/or PTO is revoked. The PBR notification form included in this guide contains a section to request that applicable permits be revoked.

Keep in mind that in some rare cases, the PBR conditions might impose more stringent limitations on the facility than those specified in their current permits. It's important for the company to evaluate whether the PBR option is advantageous for their facility.

How does Ohio EPA define "auto body refinishing facility?"

For the PBR, an 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 that are engaged in repainting used motor vehicles and light duty trucks but do not perform collision repair work, are also included in this definition. Also see the Glossary for definitions of "automobile" and "light duty truck".

Facilities that paint semi-trailers, large panel trucks, construction equipment, garbage trucks, concrete trucks and other large vehicles cannot use the PBR. The PBR is based on U.S. EPA guidance derived from actual material usage rates and operations common to the collision repair industry.

General Information - Questions & Answers

Mobile auto body painting operations that employ temporary spray booths meeting the design criteria specified by the PBR are also included in this definition.

What auto body refinishing operations are covered by the PBR?

The PBR covers all painting operations (up to two paint booths), including all paint mixing, spraying, gun cleaning, and other related activities that involve the use of materials that contain volatile organic compounds (VOCs). The PBR covers all of these operations at the facility. For each material you use, check the material safety data sheets (MSDS) to see if the “Physical Properties” section lists any VOC content.

What operations are not covered by the PBR?

The PBR is mainly concerned with emissions from painting operations, which typically account for the majority of total emissions from an auto body refinishing shop. Other sources of air pollution at the facility, such as fuel-fired heaters or boilers, parts washers using solvent, solvent recycling units, etc., may require air permits unless the equipment or activity is specifically exempted. See Appendix B for a list of common equipment exempted from air permits.

The PBR only applies to air pollution and does not cover issues related to proper disposal of wastes, discharges to the local sewer system or other regulatory requirements.

Does my shop qualify for the PBR exemption?

To be eligible for the PBR, your shop must meet all of the following criteria:

1. The facility has no more than two (2) paint spray booths;
2. The shop completes no more than 50 jobs per week (a job is defined as the total area to be refinished on an automobile body or light duty truck and may include the entire vehicle);
3. The shop uses no more than 3,000 gallons per year combined of all materials containing volatile organic compounds (these materials are typically paints, thinners, reducers and cleanup solvents);
4. All painting is done inside an enclosed booth designed to vent to a powered ventilation system equipped with either dry filtration or water wash system to capture overspray;
5. Paint is applied by either high volume low pressure (HVLP) equipment or electrostatic equipment;
6. Paint booth exhaust system(s) meet the following design criteria:
 - a.) Air flow capacity of the exhaust fan is at least 10,000 cubic feet per minute;
 - b.) Exhaust is discharged vertically without any obstructions, such as a rain cap or goose neck [Rain caps that do not interfere with the upward flow of the exhaust may be acceptable. See Appendix D for clarification on acceptable rain caps.];
 - c.) Exhaust stack is at least 16 feet tall, as measured from the ground; and
 - d.) Exhaust stack is at least 60 feet from your nearest property line.

If I apply for coverage under the PBR exemption, do I still need to comply with the requirements of OAC rule 3745-21-18 (this rule has additional requirements for auto body shops located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties)?

Yes. The PBR exempts your shop from the requirement to apply for and obtain traditional air pollution permits, but not from air pollution regulations. Auto body refinishing shops located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties are required to comply with the requirements of OAC rule 3745-21-18. For more information, visit

http://www.epa.state.oh.us/dapc/regs/3745-21/21_18.pdf

How do I apply for the PBR?

Once you determine that you qualify for the permit-by-rule exemption, you need to notify Ohio EPA that you are seeking coverage under the permit-by-rule exemption. To notify Ohio EPA, complete the PBR Notification Form (Appendix C) and submit it to your local air pollution control office. In addition, starting on the day you submit the form, you must comply with all the PBR requirements which are further discussed on the following pages. For more information concerning the PBR for auto body refinishing or to download the PBR notification form, visit <http://www.epa.state.oh.us/dapc/pbr/permitbyrule.html>.

Permit-by-Rule Requirements for Auto Body Refinishing

The following table provides both the actual text of the PBR rule on the left side of the page and short explanations and tips to aid understanding on the shaded right side. For a quick understanding of your PBR obligations, you can scan the right side of the table only. The regulatory text is taken directly from selected paragraphs of OAC rule 3745-31-03(A)(4). Copies of this rule are available at

<http://www.epa.state.oh.us/dapc/regs/regs.html>.

Under the PBR rules, there are three distinct sections:

- 1) Paragraph (A)(4): Overall requirements that exempt PBR categories from air permits, but not air pollution regulations;
- 2) Paragraph (A)(4)(a): General provisions that specify notification, record retention, and reporting requirements for all PBR categories; and
- 3) Paragraph (A)(4)(g): Specific requirements for auto body refinishing facilities.

Permit-by-Rule Text	Explanation
<p>Overall Requirements - OAC rule 3745-31-03(A)(4)</p> <p>The following air contaminant sources are exempt from the requirement to obtain a permit-to-install. These exemptions 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.</p> <p>These exemptions do not, however, exempt any air contaminant source from requirements of the federal 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 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 the exempt sources into any major new source review permitting action.</p>	<p>PBR categories are exempt from the PTI process, but you must continually operate according to the PBR conditions and keep the required records to remain eligible. Ohio EPA can request that you get a permit if your PBR source is causing a nuisance.</p> <p>Although exempt from a permit, PBR sources must still comply with air pollution regulations. The emission limits in the PBR ensure the facility does not need a Title V operating permit.</p>
<p>General provisions - 3745-31-03(A)(4)(a)</p> <p>These general provisions apply to all owner or operators who are utilizing one or more of the permit-by-rule exemptions listed in paragraphs (A)(4)(b) through (A)(4)(l).</p>	<p>There are 11 PBR categories. Only the auto body refinishing PBR (A)(4)(g) is listed in this guide.</p>
<p>Recordkeeping requirements - 3745-31-03(A)(4)(a)(i)</p> <p>The owner or operator shall collect and maintain the records described for each air contaminant source exempted under paragraph (A)(4) 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 exemption. These records shall be made available to the director or any authorized representative of the director for review during normal business hours.</p>	<p>Records retained for the PBR must be retained for five years, and must be made available to Ohio EPA upon request.</p>

Permit-by-Rule Requirements for Auto Body Refinishing

Permit-by-Rule Text	Explanation
<p>Notification requirements for new installations - 3745-31-03(A)(4)(a)(ii)</p> <p>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 exemption 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:</p> <ul style="list-style-type: none">(a) The owner or operator's and the facility contact's name;(b) The facility mailing address and telephone number;(c) The location of the air contaminant source(s);(d) A description of the air contaminant source, including any pollution control(s); and(e) A statement by the owner or operator that indicates which permit-by-rule applies to the air contaminant source.	<p>For the auto body refinishing PBR, this date is July 29, 2005.</p> <p>Ohio EPA has developed a PBR notification form specifically for auto body refinishing. Use this form for notification. See Appendix C or http://www.epa.state.oh.us/dapc/pbr/permitbyrule.html and download the form.</p>
<p>Notification requirements for existing permitted sources - 3745-31-03(A)(4)(a)(iii)</p> <p>The owner or operator of an air contaminant source which is operating under an existing permit to install and/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 and/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 and/or permit to operate are revoked.</p>	<p>If you have an existing permit(s) for your paint booth(s), you can switch them to PBR. The PBR notification form can be used to request that existing permits be revoked. Your Ohio EPA district office will evaluate your request and notify you if approved and the date you can begin operating under the PBR.</p>
<p>Notification requirements for existing permit-by-rule sources - 3745-31-03(A)(4)(a)(iv)</p> <p>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 (A)(4)(a)(ii) 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.</p>	<p>This provision does not apply to auto body refinishing since it was not an "existing" PBR category prior to July 29, 2005.</p>

Permit-by-Rule Requirements for Auto Body Refinishing

Permit-by-Rule Text	Explanation
<p>Records retention requirements - 3745-31-03(A)(4)(a)(v)</p> <p>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 this permit. Such records may be maintained in computerized form.</p>	<p>Maintain PBR records for five years. Records may be maintained either on paper or electronically.</p>
<p>Reporting requirements - 3745-31-03(A)(4)(a)(vi)</p> <p>The owner or operator shall submit required reports in the following manner:</p> <ul style="list-style-type: none"> (a) Reports of any monitoring and/or record keeping information required by the specific permit-by-rule exemption shall be submitted to the appropriate Ohio environmental protection agency district office or local air agency. (b) Except as otherwise may be provided in the 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 record keeping 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 and/or operational restriction exceeded, the probable cause of such deviation, and any corrective actions of preventive measures that have been or will be taken. 	<p>Send any required reports to your Ohio EPA district office (see Appendix F for list of Ohio EPA district offices).</p> <p>Send a report within 30 days of the date you exceed any emission limitation and/or of the date you deviate from any qualifying criteria and/or operational requirement listed in the PBR.</p>
<p>Scheduled maintenance/malfunction reporting - 3745-31-03(A)(4)(a)(vii)</p> <p>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 emissions units or any associated air pollution control system(s) 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(s) shall be accompanied by the shutdown of the emissions unit(s) that is served by such control system(s).</p>	<p>Do not operate your spray booth unless the filters are in place or the water wash system is operating properly.</p>

Permit-by-Rule Requirements for Auto Body Refinishing

Permit-by-Rule Text	Explanation								
<p>Auto body refinishing facility permit-by-rule - 3745-31-03(A)(4)(g)</p> <p>Qualifications - 3745-31-03(A)(4)(g)(i)</p> <p>An auto body refinishing facility that meets all of the following qualifications is eligible to use this permit-by-rule:</p> <ol style="list-style-type: none"> (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 (HVLV) spray equipment, or electrostatic application equipment. (f) The exhaust stack(s) of each paint spray booth at the facility: <ol style="list-style-type: none"> (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 at least sixteen feet, as measured from ground level to the point of discharge to the atmosphere. (iv) Has a point of discharge no closer than sixty feet to the nearest facility property line. 	<p>To qualify for the PBR, your operations must meet <u>all</u> of the qualifications.</p> <p>If you do not meet the qualifications as listed, then your facility may be required to obtain a permit. Contact your Ohio EPA district office.</p> <p>Check booth manufacturer data for fan capacity. See Appendix D for acceptable stack designs.</p>								
<p>Applicable emission limitations and/or control requirements - 3745-31-03(A)(4)(g)(ii)</p> <ol style="list-style-type: none"> (a) The applicable rules, emission limitations and control requirements that apply to the facility subject to this permit-by-rule are defined in the following table: 									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Applicable Rule(s)</th> <th style="width: 80%;">Applicable Emission Limitation/Control Requirements</th> </tr> </thead> <tbody> <tr> <td>Paragraph (A)(3) of rule 3745-31-05 of the Administrative Code</td> <td>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.</td> </tr> <tr> <td>Paragraph (U)(1) of rule 3745-21-09 of the Administrative Code</td> <td>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.</td> </tr> <tr> <td>Rule 3745-21-18 of the Administrative Code</td> <td>The provisions of this rule are only applicable to facilities located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties.</td> </tr> </tbody> </table>	Applicable Rule(s)	Applicable Emission Limitation/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 and Warren counties.	<p>This table lists Ohio's air pollution rules and emission limitations for shops covered by the PBR.</p> <p>There are additional PBR requirements if your shop is in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties.</p>
Applicable Rule(s)	Applicable Emission Limitation/Control Requirements								
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Permit-by-Rule Requirements for Auto Body Refinishing

Permit-by-Rule Text	Explanation
Operational requirements - 3745-31-03(A)(4)(g)(iii)	
<p>(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.</p> <p>(b) Paint application equipment shall be cleaned using one or more of the following means:</p> <ul style="list-style-type: none"> (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. <p>(c) If a water wash system is employed to control paint overspray, the facility shall comply with all applicable state and federal rules and regulations pertaining to the handling, treatment, or discharge of waste water.</p> <p>(d) For facilities located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties, the operators of paint application equipment shall be trained in the use of a high volume low pressure (HVLV) sprayer or electrostatic spray equipment in accordance with the manufacturer's specifications, and the handling of a coating and any solvents used to clean the spray equipment.</p> <p>(e) For facilities located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties, the owners or operators shall 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.</p>	<p>Maintain spray guns and spray booth filters according to the manufacturer's instructions.</p> <p>Use an enclosed system to clean guns to minimize solvent evaporation.</p> <p>If your booth has a water wash system, contact your local wastewater treatment plant for any discharge permit requirements.</p> <p>For shops in the Dayton/Cincinnati counties listed, painting personnel must be trained on the proper operation and cleaning of the spray equipment.</p> <p>For shops in the Dayton/Cincinnati counties listed, always store solvents, dirty rags and paints in tightly closed containers to minimize evaporation.</p>

Permit-by-Rule Requirements for Auto Body Refinishing

Permit-by-Rule Text	Explanation
Monitoring and/or recordkeeping requirements - 3745-31-03(A)(4)(g)(iv)	
<p>(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:</p> <ul style="list-style-type: none"> (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. <p>(b) The owner or operator of the facility shall maintain a record of the number of jobs performed per week.</p> <p>(c) The owner or operator of the facility shall maintain documentation which demonstrates each exhaust stack complies with the design requirements listed in paragraph (A)(4)(g)(i)(f) of this rule.</p> <p>(d) For facilities located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren 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 and electrostatic spray equipment 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, or its representative, upon request.</p>	<p>Maintain annual records of all VOC-containing materials used or purchased. Keep Material Safety Data Sheets (MSDS) or product data sheets to document material VOC content.</p> <p>Maintain weekly records of the number of jobs completed.</p> <p>Have documentation that the paint booth stack meets the design requirements. For shops in the Dayton/Cincinnati counties listed, you must submit documentation that says painting personnel are trained on the proper operation and cleaning of the spray equipment.</p> <p>(See Appendix E for suggested recordkeeping and reporting forms)</p>
Testing requirements - 3745-31-03(A)(4)(g)(v)	
<p>(a) Compliance with the annual material usage limitation shall be based upon the record keeping requirements specified in paragraph (A)(4)(g)(iv)(a) of this rule.</p> <p>(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.</p> <p>(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.</p>	<p>The testing requirements section is for reference only and identifies the means for demonstrating compliance with the material usage restrictions and the emission limits.</p> <p>For the PBR, you do not need to perform stack testing, measure the VOC content of any materials, or calculate emissions.</p>

Appendix A - Glossary of Terms

Air contaminant source - each separate operation, or activity that results or may result in the emission of any of the following air contaminants:

- (1) An air contaminant or precursor of an air contaminant for which a national ambient air quality standard has been adopted under the Clean Air Act;
- (2) An air contaminant for which the source is regulated under the Clean Air Act; or
- (3) A toxic air contaminant as listed in rule 3745-114-01 of the Administrative Code.

Auto body refinishing facility - 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 included in this definition. Mobile auto body painting operations, which employ temporary spray booths meeting the design criteria specified by the PBR, are also included in this definition.

Automobile - a passenger car or passenger car derivative capable of seating not more than twelve passengers.

Cold cleaner - a batch-operated device that employs a solvent for cleaning and removing soils from metal surfaces by spraying, brushing, flushing, agitation or immersion while maintaining the solvent below its boiling point. Wipe cleaning is not included in this definition.

Electrostatic sprayer - spray equipment that uses an apparatus to impart a positive electrical charge to the atomized paint stream so that it adheres to the negatively charged (grounded) part being painted.

Exempt solvent - any of the compounds which are specifically identified in paragraph (B)(6) of rule 3745-21-01 of the Administrative Code as not being volatile organic compounds. See VOC definition for a list of exempt compounds.

Hazardous air pollutant (HAP) - any air pollutant listed in, or pursuant to, Section 112(b) of the Clean Air Act. Common HAPs emitted by auto body refinishing shops include; toluene, xylene, methyl isobutyl ketone (MIBK) and ethyl benzene.

High volume, low pressure (HVLP) sprayer - an air atomized sprayer that operates at a maximum air pressure of ten pounds per square inch gauge (psig) as measured at the nozzle.

Job - the total area or areas to be refinished or repainted on an automobile or light duty truck.

Light-duty truck - a motor vehicle rated at 8,500 pounds gross weight or less that is designed primarily for highway use and for the transportation of property, or is a derivative of such vehicle.

Appendix A - Glossary of Terms

Volatile organic compound (VOC) - any organic compound that participates in atmospheric photochemical reactions. **This includes any organic compound other than the following compounds:**

- Acetone, ethane, methane, methyl acetate, methyl chloroform (1,1,1-trichloroethane), methylene chloride, methyl formate, perchloroethylene (tetrachloroethylene), PCBTF (parachlorobenzotrifluoride) t-butyl acetate;
- Chlorofluorocarbons (CFCs): CFC-11, CFC-12, CFC-113, CFC-114, CFC-115;
- Hydrochlorofluorocarbons (HCHCs): HCFC-22, HCFC-31, HCFC-123, HCFC-123a, HCFC-124, HCFC-141b, HCFC-142b, HCFC-151a, HCFC-225ca, HCFC-225cb;
- Hydrofluorocarbons (HFCs): HFC-23, HFC-32, HFC-42-10mee, HFC-125, HFC-134, HFC-134a, HFC-143a, HFC-152a, HFC-161, HFC 227ea, HFC-236ea, HFC-236fa, HFC-245ca, HFC-245ea, HFC-245eb, HFC-245fa, HFC-365mfc;
- Hydrofluorethers (HFEs): HFE-7000, HFE-7100, HFE-7200, HFE-7500;
- (CF₃)₂-CFCF₂OCH₃, (CF₃)₂-CFCF₂OC₂H₅;
- Cyclic, branched, or linear completely methylated siloxanes;
- Any organic compound listed in 40 CFR 51.100(s)(1) or (s)(5); and
- Any class of perfluorocarbon compounds that consists of (a) cyclic, branched, or linear, completely fluorinated alkanes, (b) cyclic, branched, or linear, completely fluorinated ethers with no unsaturations, (c) cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations, or (d) sulfur-containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.

These compounds have been determined to have negligible photochemical reactivity. For purposes of determining compliance with emission limits, VOC will be measured by the approved test methods. Where such a method also inadvertently measures compounds with negligible photochemical reactivity, an owner or operator may exclude these negligibly reactive compounds when determining compliance with an emission standard.

Appendix B - Air Permit Exemption List

Common equipment and activities exempt from air permits per OAC 3745-31-03(A)(1)*

- Fossil fuel-fired boilers, preheaters, air heaters, water heaters, or heaters used for other heat exchange media less than ten million British thermal units per hour burning only natural gas, distillate oil (with less than or equal to 0.5 per cent by weight sulfur), or liquid petroleum gas.
- Fossil fuel or wood fuel-fired boilers, preheaters, air heaters, or water heaters less than one million British thermal units per hour except units burning waste fuels or waste oil.
- Fossil fuel-fired furnaces or dryers less than ten million British thermal units per hour and burning only natural gas, distillate oil (with less than or equal to 0.5 per cent by weight sulfur), or liquid petroleum gas and the only emissions are from the products of combustion from fuel and water vapor and where no melting or refining occurs nor where any burning of any material occurs.
- Tumblers used for the cleaning or deburring of metal products without abrasive blasting.
- Laboratory equipment:
 - (i) Laboratory equipment and laboratory fume hoods used exclusively for chemical or physical analyses and bench scale laboratory equipment.
 - (ii) Laboratory paint booths used to prepare samples for chemical or physical analysis where the actual emissions of each laboratory paint booth is less than 3.0 tons of VOC per year and where:
 - (a) The owner or operator maintains records, available to the director upon request, detailing that the VOC emissions are less than 3.0 tons of VOC per year, and
 - (b) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
- Storage tanks for:
 - (i) Inorganic liquids including water (at standard temperature and pressure) except for tanks storing acids as described in paragraph (vii); or
 - (ii) Pressurized storage for inorganic compounds or propane, butane, isobutane, and liquid petroleum gases; or
 - (iii) Liquids with a capacity of less than seven hundred gallons; or
 - (iv) Organic liquids with a capacity of less than seventy-five cubic meters (19,815 gallons) and equipped with submerged fill, except gasoline storage tanks located at bulk gasoline plants which are subject to the requirements of paragraph (P) of rule 3745-21-09 of the Administrative Code; or
 - (v) Organic liquids with a capacity greater than or equal to seventy-five cubic meters (19,815 gallons) but less than one hundred fifty-one cubic meters (39,894 gallons) storing a liquid with a maximum true vapor pressure, as defined in 40 CFR 60.111b, of less than 15.0 kilopascals (2.176 pounds per square inch absolute) and equipped with submerged fill; or
 - (vi) Organic liquids with a capacity greater than or equal to one hundred fifty-one cubic meters (39,894 gallons) storing a liquid with a maximum true vapor pressure, as defined in 40 CFR 60.111b, of less than 3.5 kilopascals (0.508 pounds per square inch absolute); or

Appendix B - Air Permit Exemption List

(vii) Acids (as defined in the "Chemical Rubber Company (CRC) Handbook of Chemistry and Physics") stored in tanks less than or equal to 7,500 gallons capacity.

- Noncontinuous solvent recycling or reclaiming units with less than twenty gallons capacity.
- Solvent cold cleaners that meet the provisions of paragraph (O) of rule 3745-21-09 of the Administrative Code and have a liquid surface area less than or equal to ten square feet or a reservoir opening of less than six inches in diameter.
- Grinding and machining operations, abrasive blasting, pneumatic conveying, and woodworking operations controlled with a fabric filter, scrubber, or mist collector designed to emit not more than 0.03 grains of particulate per dry standard cubic foot of exhaust gas with less than four thousand actual cubic feet per minute volume, venting inside a building, and emitting less than ten pounds per day of nonparticulate matter air contaminants.
- Uncontrolled grinding, machining, and sanding operations, abrasive cleaning operations (dry or wet), pneumatic conveying and woodworking operations that have no visible emissions, vent to the inside of a building and emit less than ten pounds per day of nonparticulate matter air contaminants.
- Parts washers and rinse tanks using detergent cleaners.
- Gasoline dispensing facilities, as defined in paragraph (H) of rule 3745-21-01 of the Administrative Code, or other motor fuel dispensing facilities that are equipped with Stage I vapor control and are **not** located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, or Wood counties.
- Gasoline dispensing facilities, as defined in paragraph (H) of rule 3745-21-01 of the Administrative Code, or other motor fuel dispensing facilities that have an individual maximum annual throughput of less than six thousand gallons of gasoline per year.
- All maintenance welding.
- Arc welding where emissions of particulate matter are vented to a control device located and vented inside the building.
- Refrigerant reclaiming and recycling machines located at motor vehicle repair facilities.
- Natural gas compressor engines used for maintenance activities with a heat input rate of no greater than ten million British thermal units per hour fired by natural gas, gasoline or distillate oil (with less than or equal to 0.5 per cent by weight sulfur).
- Emergency electrical generators or emergency firefighting water pumps less than or equal to fifty horsepower that burn gasoline, natural gas, distillate oil (with less than or equal to 0.5 per cent by weight sulfur), or liquid petroleum gas.

Appendix B - Air Permit Exemption List

- Two-stroke or four-stroke, air-cooled, gasoline-powered engines no more than twenty horsepower used for lawnmowers, small electric generators, compressors, pumps, minibikes, snowthrowers, garden tractors or other similar uses.
- A dynamometer operation for fully assembled motor vehicles. This exemption includes dynamometer operations used as part of final assembly of new motor vehicles, roll testing of new motor vehicles, testing of vehicles used solely for competition, testing of motor vehicles for compliance with emissions standards, motor vehicle maintenance, road testing and repair dynamometers and other similar fully assembled motor vehicle dynamometer operations.

*This is a partial list containing the exemptions for equipment most likely to be located at auto body collision and auto repair facilities. For the complete list, see OAC rule 3745-31-03(A)(1) or go to

http://www.epa.state.oh.us/dapc/regs/3745-31/3745_31.html.

PBR notification form and instructions on following pages



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(A)(4)(a), and (g). 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

Yes No Does the facility use less than 3,000 gallons of all paints, solvents and other coatings per year?

Yes No Does the facility do less than 50 jobs per week?

Yes No Does the facility use HVLP or electrostatic spray equipment for all paints and coatings applied by spraying?

V. Spray Booth Information – See Instructions

Yes No Does the facility have two or less spray booths for painting?

Yes No Are all spray booths equipped with a dry filtration or water wash system?

Yes No Does each spray booth stack discharge vertically to the atmosphere without any obstruction?

Yes No Is each booth's exhaust fan rated at or above 10,000 CFM (cubic feet per minute)?

Yes No Is the top of each spray booth stack at least 16 feet from ground level?

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 (District Office/ Local Air Agency) for your county. (Please refer to the Air Permit Review Agency map in the attached instructions for mailing address).

Rev 05/07

For Ohio EPA Use Only:

PBR ID / FAC ID: _____

Date received: _____

INSTRUCTIONS: Permit -by-Rule Notification 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 <http://www.epa.state.oh.us/dapc> and select the topic "District Offices and Local Air Agencies". For more information on the permit-by-rule process, including online tracking of your notification form, go to <http://www.epa.state.oh.us/dapc/pbr/permitbyrule.html>

This is a notification form for an auto body refinishing facility which is intended to be installed and/or operated according the permit -by-rule provisions of OAC 3745-31-03(A)(4)(a) and (g). "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. A list of equipment exempt from air permitting requirements is contained in OAC 3745-31-03(A)(1) . For a copy of this regulation, contact your Ohio EPA District Office or Local Air Agency or go to <http://www.epa.state.oh.us/dapc/regs/regs.html>

- I. Enter the company name, corporate name or other name and mailing address for the legal entity which owns or operates the facility specified in the permit-by-rule notification (example: Smith Collision Repair, Inc. or ABC Body Shop). Provide the name of the individual to be contacted concerning questions about the notification form being submitted.
- II. Enter the name and address for the facility at which the permit-by-rule units (equipment) operate (example: 45th Street Shop, Columbus Site #3). This could be the same as the applicant name if the facility has no independent name. This address information is the location of the facility and not the mailing address, unless they are the same. Provide the name of the individual at the facility to be contacted concerning questions about the operation of the facility. Please specify the 10-digit Ohio EPA facility ID number if the facility has been issued air pollution permits from the Ohio EPA. If no permits exist, leave this blank. The facility ID number is contained in permits to install, permits to operate, or fee emission reports sent to the facility by Ohio EPA. If not known, contact the District Office or Local Air Agency with jurisdiction in the area the facility is located to confirm the facility ID number.
- III. Check all applicable boxes. Check "Initial" if this is a new installation or the first request to operate under a permit-by-rule provision. Check "Equipment modification" if making substantial equipment changes (example: installing or replacing a paint booth, changing exhaust filtration system design) since the initial notification. Check "Ownership change" if the facility has changed names, contact person, or has a new owner intending to operate under a permit-by-rule provision. If using this form to also request the revocation of existing permits, specify the permit numbers and all applicable 4-digit emission unit IDs (R001, K001, etc.) These numbers are contained in permits to install, permits to operate, or fee emission reports sent to the facility by Ohio EPA. If not known, contact the District Office or Local Air Agency with jurisdiction in the area the facility is located to confirm the permit numbers and emission unit ID numbers.
- IV. 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.**
- V. 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 http://www.epa.state.oh.us/dapc/title_v/respoff.pdf for more information on who is authorized to sign this form or contact your Ohio EPA District Office or Local Air Agency.

Appendix D - Exhaust Stack Guidance

Stack and Rain Guard Guidance for the Auto Body Refinishing Permit-by-Rule

Background

The auto body refinishing permit-by-rule (PBR) requires paint booth stacks that:

- Are at least 16 feet high (as measured from the ground to the tip of the stack);
- Discharge air contaminants in a vertical direction, without obstructions;
- Have a fan designed to provide an exhaust volume of at least 10,000 CFM; and
- Are at least 60 feet from the nearest property line.

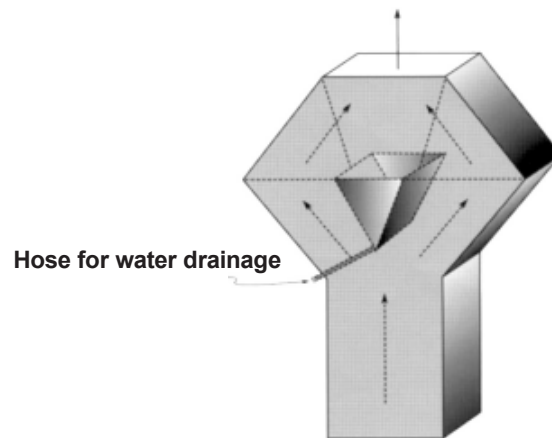
The purpose of these requirements is to allow for upward dispersion of pollutants, thereby reducing impacts and odor nuisances.

Good engineering design for exhaust stacks includes a rain guard. Rain guards are designed to keep rain, snow and animals (birds and squirrels) out of the stack. It is important that a rain guard not prevent or hinder the vertical (upward) discharge of the exhaust stream. Having a rain guard or stack design that redirects the discharged air back toward the ground defeats the purpose of having a vertical stack.

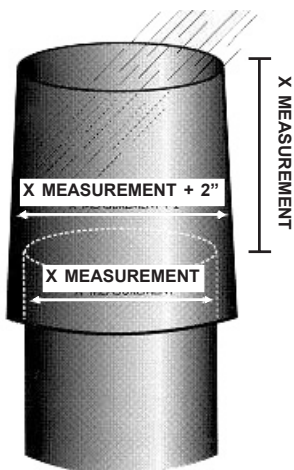
Examples of Acceptable Rain Guards

Rain guards come in a variety of designs, and not all are acceptable for the auto body refinishing PBR. Some examples of acceptable rain guards are shown below.

Hexagonal Stack - this design diverts air around an internal wedge used to catch rain. A hose connected to the bottom of the wedge drains the collected rainwater.

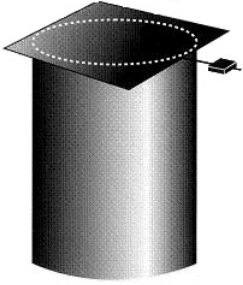


RAIN AT A 45° ANGLE

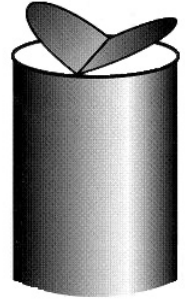


Stack-in-a-Stack - this design is based on the principle that rain falls at an angle. A short outer stack of slightly larger diameter surrounds the top of the inner paint booth stack. Rain strikes and runs down the inner wall of the short outer stack instead of down the inner paint booth stack.

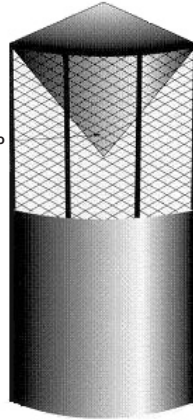
Appendix D - Exhaust Stack Guidance



Hinged and Butterfly Stacks - a single or double hinged flapper covers the top of the stack and is pushed open when the fan is turned on. The flapper closes when the fan is turned off.



Cone angle 60° to 75°



Inverted Cone Stack - grating or brackets support a cone that is suspended above the stack opening.

Other designs may be acceptable. Contact your Ohio EPA district office or local air agency for more information.

Examples of Unacceptable Rain Guards



"China Hat" or mushroom-shaped cap - stops upward flow of exhaust stream



"Goose Neck" or U-shaped Stack - discharges exhaust sideways or downward and does not allow for upward, vertical flow

Where Can I Get Stack and Rain Guards?

Some companies that specialize in sheet metal ducting also make stacks and rain guards. Also contact vendors that sell spray booths. These companies can be found in the phone book under "Sheet Metal Work" or "Ventilating Contractors."

*Permission to reproduce the illustrations and portions of text made courtesy of the Spokane Regional Clean Air Agency

Appendix E - Example Recordkeeping and Reporting Forms

- 1. Material Usage Record**
- 2. Spray Booth and Exhaust Stack Specifications**
- 3. Notification Report for OAC rule 3745-21-18 (For shops in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, and Warren counties only)**

Note: The following forms are only a suggested recordkeeping format. Other formats, electronic or hard copy, can be used as long as the minimum data required by the PBR is maintained.

Record of spray booth and exhaust stack specifications		
	Spray Booth #1	Spray booth #2
Manufacturer		
Model Number		
Spray equipment	<input type="checkbox"/> HVLP <input type="checkbox"/> Electrostatic	<input type="checkbox"/> HVLP <input type="checkbox"/> Electrostatic
Filter system	<input type="checkbox"/> Dry filters <input type="checkbox"/> Water wash	<input type="checkbox"/> Dry filters <input type="checkbox"/> Water wash
Fan rating, cubic feet per minute (CFM)	_____ CFM	_____ CFM
Stack height above ground (ft.)	_____ ft.	_____ ft.
Stack distance to nearest property line (ft.)	_____ ft.	_____ ft.
Vertical stack discharge?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

A facility operating under the auto body refinishing permit-by-rule is required to keep this information on file at the facility and make it available to Ohio EPA upon request.

**Notification Report for OAC rule 3745-21-18
For Commercial Motor Vehicle and Mobile Equipment Refinishing Operations**

Submission of this form constitutes notice that the party identified in Section I of this form complies with the notification provisions of OAC rule 3745-21-18(C). An original signature is needed and forms transmitted by fax will not be accepted.

Section I - Applicant Information

Company (Applicant) Name: _____

Company Location Address: _____
(address) (city) (state) (zip)

Contact Name (Print): _____ Phone: _____

Section II - Demonstration of Use of High Efficiency Transfer Equipment

1. Check (✓) each application technique your shop uses to apply coating containing volatile organic compounds (VOC) as a pretreatment, primer, sealant, base coat, clear coat, or topcoat to mobile equipment for commercial purpose:

- | | |
|-----------------------------------|----------------------------------|
| _____ Flow or Curtain Coating | _____ Electro-deposition Coating |
| _____ Dip Coating | _____ High Volume, Low Pressure |
| _____ Roller Coating | _____ Electrostatic Spray |
| _____ Brush Coating | _____ Airless Spray |
| _____ Cotton-tip Swab Application | _____ Air-assisted Airless Spray |

2. Does your shop apply VOC-containing material with any other method other than those listed above?
 YES NO
(If "yes," you are required to obtain Ohio EPA approval to use this method. Please contact your local Ohio EPA field office.)

Section III - Employee Coating Application Training Verification

Has each employee who applies VOC containing coating been trained per the manufacturer's specifications to properly use the high efficiency coating applicators indicated above? YES NO

If yes, please describe below the method(s) used to ensure proper training of each employee who applies VOC containing coating at your shop. [Some examples are: 1.) "Each paint technician is trained by ABC Spray Gun Company;" or 2.) "Paint shop supervisor trains each paint technician per HVLP gun manufacturer's operating manual."] If additional space is needed to describe your training method, please add an attachment labeled "Section III."

Section IV - Demonstration of Proper Spray Gun Cleaning System:

Check (✓) each cleanup procedure your shop uses to clean spray guns:

- _____ An enclosed spray gun cleaning system kept closed when not in use
- _____ Un-atomized discharge of solvent into paint waste container kept closed when not in use
- _____ Disassembly of paint gun and cleaning in vat kept closed when not in use
- _____ Atomized spray into a paint waste container that is designed to capture all atomized solvent emissions

Section V - Demonstration of Proper Material Management

1. Does your shop store all VOC-containing or moistened materials, including coatings (new and used), solvents, additives, wastes, and any applicators or towels, in non-absorbent, non-leaking containers? YES NO
2. Are containers kept closed when not in use? YES NO

Section VI - Employee Material Management and Cleanup Training Verification

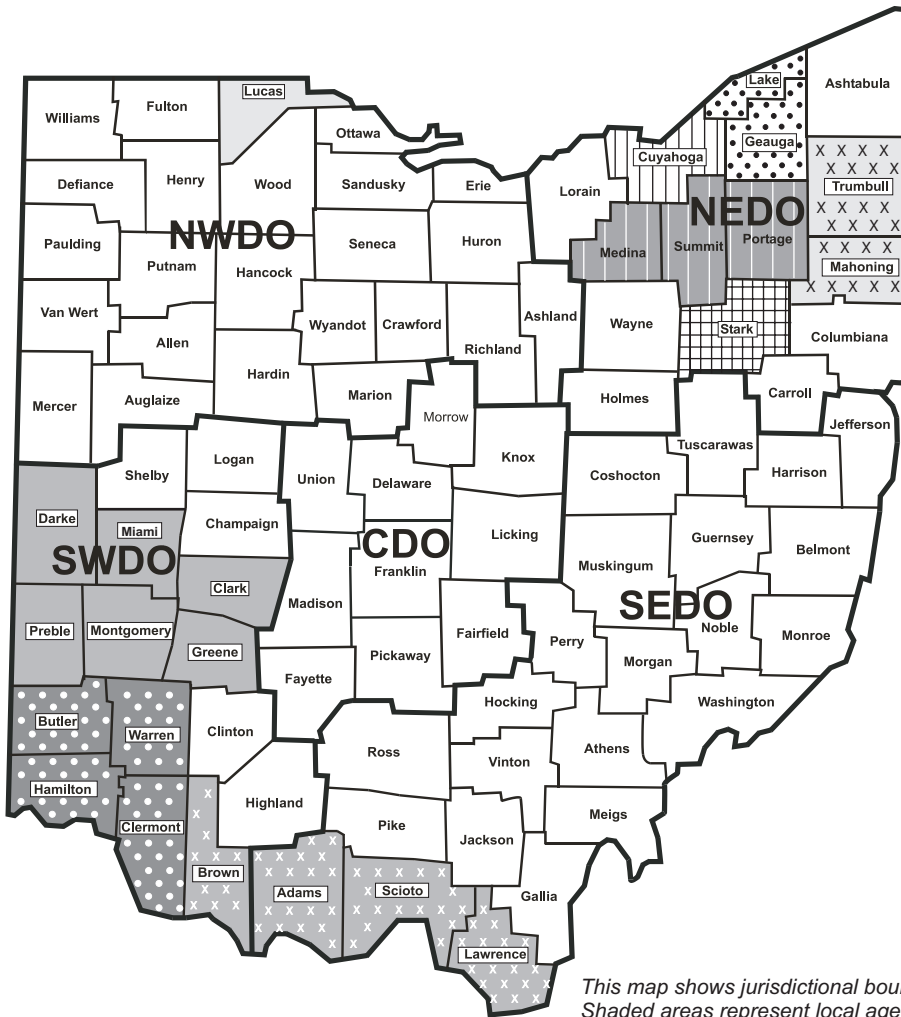
Has each employee who uses VOC-containing coatings and cleanup materials been trained in the proper procedure for cleaning spray guns and managing VOC-containing materials? YES NO

If yes, please describe below the method(s) used to ensure proper training of each employee who uses VOC containing coatings and cleanup materials. [An example is: "Paint shop supervisor trains each paint technician the proper procedures for the management of VOC-containing coatings and cleanup materials, as well as spray gun cleaning techniques."] If additional space is needed to describe your training method, please add an attachment labeled "Section VI."

Section VII - Signature

Owner or Operator Name (Print): _____ Title: _____
Owner or Operator Signature: _____ Date: _____

Ohio EPA District Offices and Local Air Pollution Control Agencies



*This map shows jurisdictional boundaries.
Shaded areas represent local agencies within Ohio EPA districts.*



District Offices

- CDO Central District Office**
50 West Town Street, Suite 700
Columbus, OH 43215
(614) 728-3778 FAX (614) 728-3898
- SEDO Southeast District Office**
2195 Front St.
Logan, OH 43138
(740) 385-8501 FAX (740) 385-6490
- NEDO Northeast District Office**
2110 E. Aurora Rd.
Twinsburg, OH 44087
(330) 425-9171 FAX (330) 487-0769
- NWDO Northwest District Office**
347 North Dunbridge Rd.
Bowling Green, OH 43402
(419) 352-8461 FAX (419) 352-8468
- SWDO Southwest District Office**
401 E. Fifth St.
Dayton, OH 45402-2911
(937) 285-6357 FAX (937) 285-6249

Local Air Pollution Control Agencies

- | | | |
|---|---|--|
|  <p>Akron Regional Air Quality Management District
146 South High St, Room 904
Akron, Ohio 44308
(330) 375-2480 FAX (330) 375-2402</p> |  <p>Cleveland Dept. of Public Health Division of Air Quality
1925 St. Clair Ave.
Cleveland, Ohio 44114-2080
(216) 664-2297 FAX (216) 420-8047</p> |  <p>Portsmouth Local Air Agency
605 Washington St., Third Floor
Portsmouth, Ohio 45662
(740) 353-5156 FAX (740) 353-3638</p> |
|  <p>Air Pollution Control Division Canton City Health Dept.
420 Market Ave. North
Canton, Ohio 44702-1544
(330) 489-3385 FAX (330) 489-3335</p> |  <p>Regional Air Pollution Control Agency Montgomery County Health Dept.
117 South Main St.
Dayton, Ohio 45422-1280
(937) 225-4435 FAX (937) 225-3486</p> |  <p>City of Toledo Division of Environmental Services
348 South Erie Street
Toledo, Ohio 43604
(419) 936-3015 FAX (419) 936-3959</p> |
|  <p>Dept. of Environmental Services Air Quality Programs
250 William Howard Taft Road
Cincinnati, Ohio 45219-2660
(513) 946-7777 FAX (513) 946-7778</p> |  <p>Lake County General Health District Air Pollution Control *
33 Mill Street
Painesville, Ohio 44077
(440) 350-2543 FAX (440) 350-2548</p> |  <p>Mahoning-Trumbull APC Agency *
345 Oak Hill Ave., Suite 200
Youngstown, Ohio 44502
(330) 743-3333 FAX (330) 744-1928</p> |

**Facilities located within these jurisdictions should file air permit applications with Ohio EPA's Northeast District Office (NEDO).*

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Printed on recycled paper

Publication date: October 2007



Auto Service and Repair Facility Pollution Prevention

There are many pollution prevention opportunities for auto repair facilities. Reducing the risk to public health, safety and the environment can also help your bottom line.

Automotive repair facilities can generate spent solvents from parts washers, lead-acid batteries, used antifreeze, absorbents, used oil and filters, shop cleaning wastes, aerosol cans, paint wastes, refrigerants, tires and various engine and auto body parts. There are many P2 opportunities for auto repair facilities.

General P2 Opportunities

Use catch pans to prevent leaks, drips and spills from reaching the floor. Keep a spill kit on site, and train employees yearly in spill prevention and response. Know where your floor drains lead. Using floor drains improperly can contaminate nearby surface and/or drinking waters.

Keep waste streams separate for reuse, recycling or treatment. Keep non-hazardous materials from becoming contaminated. Label all materials and wastes. Keep tight-fitting lids on containers except when adding or removing material or waste.

Control inventory to prevent overuse or underuse of materials. Don't let the inventory become old and useless, creating hazardous wastes. Don't store materials in a manner that makes them useless. For example, some materials are damaged by freezing, heating or getting wet. Use a first-in, first-out policy.

Used Oil and Antifreeze

Recycle used oil, antifreeze, engine fluids, batteries and used parts. Use pop-up level indicators on drums and other bulk receptacles to prevent overfilling. Oil filters should be hot drained and crushed prior to disposal/recycling. Burn used oil onsite for energy recovery, but be sure to follow proper handling and air pollution control regulations. Some examples of used oil include engine oil, lubricating oil, brake fluid, transmission fluid and hydraulic fluid.

Solvents/Parts Washing

Consult the Material Safety Data Sheet (MSDS) before purchasing a new product. Substitute less toxic or nontoxic solvent alternatives whenever possible. Options include terpenes, citric acid-based cleaners, microbial cleaners or aqueous or water-based cleaners.

Microbial cleaners use enzymes to digest the oils and other soils from parts, allowing the solution to be used for an extended period. Some shops can use their microbial cleaner for almost two years, adding only enzyme and water with no loss of cleaning power.

Aqueous or water-based cleaners can reduce worker exposures and hazardous wastes. These spent cleaners, however, may become a hazardous waste when used for long periods of time due to heavy metal build-up.

Keep parts washers away from heat sources and drafts to prevent evaporation. Increase the time between solvent change outs. Change solvent only when it loses its cleaning power, not on a schedule or because it looks dirty. Use a two-stage

What is Pollution Prevention?

Pollution prevention (P2) is the use of source reduction techniques to reduce risk to public health, safety, welfare and the environment and, as a second preference, the use of environmentally sound recycling to achieve these same goals. P2 addresses all types of waste and environmental releases to the air, water and land.

Auto Service and Repair Facility Pollution Prevention

cleaning system, using dirty solvent for pre-cleaning, then finish cleaning with clean solvent. Drain all parts completely to reduce the drag-out loss of cleaning fluids. Installing a drainage shelf may help.

Parts should be pre-cleaned by mechanical means, such as wire brushes or rags. This will decrease the amount of sludge and soil loading on the system. Clean only the parts that need to be cleaned for the repair. Install a filter to extend the cleaning time of the solvent. Use a solvent parts washer with a built-in distillation unit that supplies continuous clean solvent.

Benefits of Auto Service and Repair Facility P2

Auto body shops and repair facilities must comply with numerous environmental laws and regulations. Implementing some of the P2 techniques described in this fact sheet may help reduce some of the requirements and the costs of compliance. Environmental benefits include protection of surface waters and/or drinking water supplies, energy recovery from burning used oil onsite, reduction in the amount of hazardous waste and reduced worker exposure.

Where to Get More Help

Contact the Office of Compliance Assistance and Pollution Prevention at (800) 329-7518 for more information or check the Division of Environmental and Financial Assistance website at epa.ohio.gov/defa/. For information about ways that other Ohio companies may be implementing pollution prevention, and possible ideas pertinent to your facility, please refer to our [*Encouraging Environmental Excellence \(E3\) web page*](#).

MOTOR VEHICLE REPAIR CONTINUED

- [] If you will provide towing services, you may need to register with the **Public Utilities Commission of Ohio's (PUCO) Motor Carrier Division**. It depends on the size of the vehicle you will drive. Contact the division at **(800) 686-7826**. Information and registration forms can also be found on-line at www.puco.ohio.gov.
- [] If you will tow oversize loads, you will need a special hauling permit from the **Ohio Department of Transportation (ODOT)**. Contact ODOT's main office at **(614) 466-7170** or your ODOT District Office for more information. Permit and fee information can also be found at www.dot.state.oh.us. **Remember to check local government agencies.**
- [] **Storage tanks** must be inspected before use. Contact the local fire authority or the **State Fire Marshal**. The State Fire Marshal's Office can be reached at **(614) 752-8200** and is also on-line at www.com.state.oh.us/fire. **Remember to check local government agencies.**
- [] Ohio's motor vehicle repair laws can be found in **Ohio Revised Code (ORC) Section 4775.03**.
- [] Ohio's motor vehicle repair laws and regulations can be found in **Ohio Administrative Code (OAC) 3901-1-54**.
- [] The **ORC** and **OAC** can be found in your local library or on-line at <http://codes.ohio.gov/>.

For more help, contact your local Small Business Development Center (SBDC).

www.ohiosbdc.ohio.gov

REMEMBER TO CHECK LOCAL GOVERNMENT AGENCIES

THIS CHECKLIST IS ABOUT STATE REQUIREMENTS.

NACIS 238290/16