OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

Re: Permit to Install
Stark County
Application No: 15-999

CERTIFIED MAIL

RECEIVED
NOV 25 1992
CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION

November 18, 1992

REPUBLIC STORAGE SYSTEM COMPANY
ROBERT ESHBACH
1038 BELDEN AVE NE
CANTON, OH 44705

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: US EPA
CANTON AIR POLLUTION CONTROL

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State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 15-999
APS Premise No. 1576050866
Permit Fee: $800.00

Name of Facility: REPUBLIC STORAGE SYSTEM COMPANY

Person to Contact: ROBERT ESHBACH

Address: 1038 BELDEN AVE NE
CANTON, OH 44705

Location of proposed source(s): 1038 BELDEN AVE NE
CANTON, OHIO

Description of proposed source(s):
FOUR COLD CLEANERS.

Date of Issuance: November 18, 1992

Effective Date: November 18, 1992

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCE(S)

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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a $15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for REPUBLIC STORAGE SYSTEM COMPANY located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification/ Description	BAT Determination	Applicable Federal and OAC Rules	Permit Allowable Mass Emissions and/ or Control & Usage Requirements
L001	45 Gallon Hydrocarbon Solvent Cold Cleaner; TD44 Maintenance Washer - Tool and Die	Cover - See Terms and Conditions	3745-31-05 3745-21-09(O)	.1 Ton OC/Yr
L002	30 Gallon Hydrocarbon Solvent Cold Cleaner; ML 30 Maintenance Parts Washer Millwright	Cover - See Terms and Conditions	3745-31-05 3745-21-09(O)	.1 Ton OC/Yr
L003	30 Gallon Hydrocarbon Solvent Cold Cleaner; EL 30 Maintenance Parts Washer Electrical	Cover - See Terms and Conditions	3745-31-05 3745-21-09(O)	.1 Ton OC/Yr
L004	30 Gallon Hydrocarbon Solvent Cold Cleaner; TR 30 Maintenance Parts Washer Tractor	Cover - See Terms and Conditions	3745-31-05 3745-21-09(O)	.1 Ton OC/Yr

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
OC	.4

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 218 Cleveland Ave. SW, 3rd Floor, City Hall, Canton, Ohio 44702.

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

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance test conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

BAT FOR COLD CLEANERS

In accordance with OAC Rule 3745-21-09(O)(2), each owner or operator of a cold cleaner shall:

(a) Equip the cold cleaner with either:

(i) a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute measured at 100°F or the solvent is heated or agitated, the cover shall be signed and constructed so that it can be easily operated with one hand; or

(ii) a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area which drains back to the reservoir, provided a sink-like area has an open drain area of less than 16 square inches and provided the solvent neither is heated above 120°F nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100°F;

(b) Equip the cold cleaner with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100°F the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining unless an internal type drainage device cannot fit into the cleaning system;

(c) Install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at 100°F, or if the solvent is heated above 120°F

(i) freeboard that gives a freeboard ratio greater than or equal to 0.7;

(ii) water cover (solvent must be insoluble in and heavier than water); or

(iii) other systems of equivalent control, such as refrigerated chiller or carbon adsorption, approved by the Director; and

(d) Operate and maintain the cold cleaner in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.