



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/26/2011

Certified Mail

Robert Eshbach
Republic Storage Systems LLC
1038 Belden Ave N.E.
same
Canton, OH 44705

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1576050866
Permit Number: P0108851
Permit Type: Initial Installation
County: Stark

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Canton City Health Department. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Canton; Pennsylvania; West Virginia



FINAL

Division of Air Pollution Control
Permit-to-Install
for
Republic Storage Systems LLC

Facility ID:	1576050866
Permit Number:	P0108851
Permit Type:	Initial Installation
Issued:	10/26/2011
Effective:	10/26/2011



Division of Air Pollution Control
Permit-to-Install
for
Republic Storage Systems LLC

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Authorization

Facility ID: 1576050866
Facility Description: Steel Locker & Steel Metal Storage manufacturer
Application Number(s): A0042903, A0042926
Permit Number: P0108851
Permit Description: Initial installation PTI for a 40 lb/hr powder coating line, which includes a 5-stage, water-based cleaning/surface-prep system with 4.8 and 2.5 mmBtu/hr NG-fired heating tubes, 3.5 mmBtu/hr NG-fired drying oven, two electrostatic powder spray booths in a sealed, air conditioned room, and a 5.5 mmBtu/hr NG-fired, 250 deg F bake oven. Powder overspray is collected for reuse by cartridge filters that are vented inside the sealed room. Each spray booth also has a final filter rated at 99.9% efficiency and also vented inside the sealed room.
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 10/26/2011
Effective Date: 10/26/2011

This document constitutes issuance to:

Republic Storage Systems LLC
1038 Belden Ave N.E.
same
Canton, OH 44705

of a Permit-to-Install for the emissions unit(s) identified on the following page.

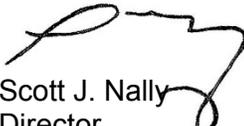
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108851

Permit Description: Initial installation PTI for a 40 lb/hr powder coating line, which includes a 5-stage, water-based cleaning/surface-prep system with 4.8 and 2.5 mmBtu/hr NG-fired heating tubes, 3.5 mmBtu/hr NG-fired drying oven, two electrostatic powder spray booths in a sealed, air conditioned room, and a 5.5 mmBtu/hr NG-fired, 250 deg F bake oven. Powder overspray is collected for reuse by cartridge filters that are vented inside the sealed room. Each spray booth also has a final filter rated at 99.9% efficiency and also vented inside the sealed room.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K010
Company Equipment ID:	740 Powder Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Canton City Health Department.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Canton City Health Department. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Canton City Health Department every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Canton City Health Department in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Canton City Health Department concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Canton City Health Department.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Canton City Health Department. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. K010, 740 Powder Line

Operations, Property and/or Equipment Description:

Powder coating line with maximum powder usage capacity of 40 lb/hr. Includes a 5-stage, water-based cleaning/surface-prep system with 4.8 and 2.5 mmBtu/hr natural gas-fired heating tubes, 3.5 mmBtu/hr natural gas-fired drying oven, two electrostatic powder spray booths in a sealed, air conditioned, "environmental room," and a 5.5 mmBtu/hr natural gas-fired, 250 deg F bake oven. Powder overspray is collected for reuse by cartridge filters that are vented inside the sealed environmental room. Each spray booth also has a final filter rated at 99.9% efficiency at 1 micron. The final filters are also vented inside the sealed environmental room.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 [Best Available Technology (BAT)]	Particulate emissions (PE)* shall not exceed 0.024 pound per hour and 0.11 tons per year as a combined total from the outlets of the final filters of powder spray booths #1 and #2. See b)(2)a. below. Visible particulate emissions shall not exceed 5% opacity as a six-minute average, from any stack serving this emissions unit, except as provided by rule. See b)(2)b. below. No visible emissions of fugitive dust except for 1 minute during any 60-minute period. See b)(2)c. below.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 [Less than 10 ton/yr BAT exemption]	See b)(2)e. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/2001. See b)(2)e. below.
d.	OAC rule 3745-17-07(B)(1) [Note: This emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08.]	The visible emission of fugitive dust limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/2001. See b)(2)e. below.
e.	OAC rule 3745-17-08(B) [Note: This emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08.]	The control measures specified by this rule are equivalent-to or less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/2001. See b)(2)e. below.
f.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/2001. See b)(2)e. below.
g.	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the uncontrolled potential-to-emit for all of the natural gas fuel burning equipment in this emissions unit. See f)(1)e. below.

* For the purposes of this permit, all particulate emissions (PE) are assumed to be particulate matter less than 10 microns in diameter (PM₁₀)

(2) Additional Terms and Conditions

- a. The hourly and annual mass emissions limitations specified in b)(1)a. above are based on the emissions unit's potential to emit (PTE) with controls. Therefore, no records and reports are required to demonstrate compliance with these limitations.

- b. According to Engineering Guide No. 75 (Ohio EPA DAPC), the discharge points from the final filters on powder spray booths #1 and #2 are by definition considered stacks, even if they are vented inside the building. Other stacks covered by these terms and conditions include stacks into the ambient air used to vent the cleaning/surface-prep system, drying oven and bake oven components of this emissions unit.
- c. Compliance with OAC rule 3745-31-05(A)(3), Best Available Technology (BAT), shall also be demonstrated as follows:
- i. the use of a total enclosure around powder spray booths #1 and #2, and a fabric filter on each booth to control particulate emissions in compliance with the visible emissions limitation and mass emissions limitations;
 - ii. compliance with Operational Restrictions c)(1) and c)(2) below; and
 - iii. compliance with Monitoring and/or Recordkeeping Requirements d)(1) thru d)(4) below.
- d. With the emissions limits and control measures mentioned in term b)(1) a. above, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform with ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for sources having potential to emit, taking into account controls, less than ten tons per year of emissions of an NAAQS pollutant or precursor. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exist as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then the emission limits above under b)(1)a. no longer apply. See next section, b)(2)e.
- e. This term only applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. In that case only, the following Terms and Conditions will apply instead of those listed under b)(1)a.:
- i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM₁₀* emissions from this emissions unit since the calculated annual emission rate for PE/PM₁₀* is less than 10 tons per year taking into account the controls described in term c)(1) below.

* For the purposes of this permit, all particulate emissions (PE) are assumed to be particulate matter less than 10 microns in diameter (PM₁₀).
 - ii. Pursuant to OAC rule 3745-17-11(B)(1), particulate emissions (PE) shall not exceed 0.551 lb/hr as a combined total from the outlets of the final filters of powder spray booths #1 and #2.

- iii. Pursuant to OAC rule 3745-17-07(A)(1), visible particulate emissions shall not exceed 20% opacity as a six-minute average, from any stack serving this emissions unit. Also see b)(2)b. above.
- iv. Pursuant to OAC rule 3745-17-07(B)(1), visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.
- v. Control measures and work practices shall be utilized as described in terms c)(1) and d)(1) through d)(5) below, not as BAT requirements, but rather as compliance with the requirements of OAC rules 3745-17-08(B)—reasonably available control measures for fugitive dust in Appendix A areas, and 3745-17-11(C)—requirements for surface coating processes.
- vi. Operational Restriction c)(2) shall be applicable, not as a BAT requirement, but rather as a voluntary restriction accepted by the permittee.
- vii. Recordkeeping requirements d)(6) and d)(7) shall be applicable, not as BAT requirements, but rather as voluntary requirements accepted by the permittee.

c) Operational Restrictions

- (1) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manuals with any modifications deemed necessary by the permittee. The dry particulate filter system shall be employed during all periods of coating application to control particulate emissions.
- (2) Natural gas shall be the only fuel used to supply heat to the cleaning/surface-prep system, drying oven and bake oven components of this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter system with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter system to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each dry particulate filter shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

- (3) In addition to the periodic inspections described above, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter system while the emissions unit is shut down, and perform any needed maintenance and repair to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
 - (5) In the event that the dry particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry particulate filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the dry particulate filter system is not operating in accordance with such requirements.
 - (6) For each day during which the permittee burns a fuel other than natural gas in the cleaning/surface-prep system, drying oven or bake oven components of this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
 - (7) The permittee shall maintain the record keeping required by terms d)(1) thru d)(6) above on site for a period of not less than five years.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any daily records showing that the dry particulate filter system was not in service or was not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals (with any documented modifications made by the permittee) when the emissions unit was in operation;
 - b. all days during which the dry particulate filter system was not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, and any corrective actions taken to repair or otherwise return the dry particulate filter system to operation in accordance with such requirements; and
 - c. all days during which a fuel other than natural gas was burned in the cleaning/surface-prep system, drying oven or bake oven components of this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) **Testing Requirements**

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions, if applicable, shall be determined in accordance with the following methods:

a. Emission Limitation:

If term b)(1)a. above is applicable (BAT limitation) the following limitations apply:

Particulate emissions (PE)* shall not exceed 0.024 pound per hour and 0.11 tons per year as a combined total from the outlets of the final filters of powder spray booths #1 and #2.

* For the purposes of this permit, all particulate emissions (PE) are assumed to be particulate matter less than 10 microns in diameter (PM₁₀).

If term b)(1)b. above (< 10 tpy BAT exemption) is applicable rather than b)(1)a, then the above emissions limitations do not apply. See Emission Limitation f)(1)d instead.

Applicable Compliance Method:

The hourly emission limitation was established based on the maximum powder spray rate of 40 lb/hr, 40% transfer efficiency as a worst-case estimate, and 99.9% final filter control efficiency.

$$(40 \text{ lb/hr}) \times (1 - 0.40) \times (1 - 0.999) = 0.024 \text{ lb}_{PE}/\text{hr}$$

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum annual hours of operation, 8760, and then dividing by 2000 pounds per ton.

$$(0.024 \text{ lb}_{PE}/\text{hr}) \times (8760 \text{ hr/yr}) \div (2000 \text{ lb/ton}) = 0.105 \text{ ton}_{PE}/\text{yr}, \text{ rounded to } 0.11 \text{ tpy}$$

Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity as a six-minute average or 20% opacity as a six-minute average, depending upon whether b)(1)a. or b)(1)b. above is applicable.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with U.S. EPA Method 9.

c. Emission Limitation:

Visible emissions of fugitive dust from this emissions unit shall either be "No visible emissions of fugitive dust except for 1 minute during any 60-minute period," or "shall not exceed 20% opacity as a three-minute average," depending upon whether b)(1)a. or b)(1)b. above is applicable. (This term is applicable pursuant to OAC rule 3745-17-07(B)(1) because this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08.)

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

The following limitation only applies if the BAT limitations under b)(1)a. above no longer apply. In that case only, and under the terms listed under b)(1)b. above (<10 ton/year BAT exemption), particulate emissions (PE) shall not exceed 0.551 lb/hr as a combined total from the outlets of the final filters of powder spray booths #1 and #2 limitation, pursuant to OAC rule 3745-17-11(B)(1).

Paragraph (B)(1) of OAC rule 3745-17-11 applies because the source is located in Stark County. Emission limitations can be determined from either Table I or Figure II, with the more stringent of the two to be used.

Table I is based on maximum process weight rate (P), which is 40 lb (0.02 tons) of powder per hour. For $0 < P \leq 0.05$ tons, the corresponding allowable emissions rate (E) is 0.551 lb/hr.

Figure II is based on maximum uncontrolled particulate emissions rate, which in this case is calculated based on the maximum powder usage rate of 40 lb/hr, a worst-case transfer efficiency estimate of 40%, and a conservative estimate of 90% overspray reclamation by the cartridge filter system:

$$(40 \text{ lb}_{\text{POWDER}}/\text{hr}) \times (1 - 0.40) \times (1 - 0.90) = 2.4 \text{ lb}_{\text{PE}}/\text{hr}$$

[Note: the cartridge filters are an essential part of the manufacturing process because they function primarily as material reclamation devices. Thus, they are not considered control equipment. To the extent possible, the overspray is collected, then returned to production because it is fully reusable. Ohio EPA DAPC Engineering Guide No. 37, 8/11/2010, clearly allows for this interpretation.]

The value calculated above, 2.4 lb_{PE}/hr, is too low to allow Figure II to be used to determine an allowable emissions rate. OAC rule 3745-17-11(A)(2)(a)(ii) states

that Figure II shall not apply “to any source with an uncontrolled mass rate of emission of less than ten pounds per hour.” Therefore, the emissions limitation of 0.551 lb/hr determined from Table I is the only applicable value.

e. Emission Limitation – for informational purposes only:

OAC rule 3745-17-10(B) concerns restrictions on particulate emissions from fuel burning equipment. The particulate emission limitation specified paragraph (B)(1) of this rule is 0.326 lb/hr, which is less stringent than the uncontrolled potential-to-emit of 0.122 lb/hr for all of the natural gas fuel burning equipment in this emissions unit, calculated as follows:

The combined total maximum heat input for the four natural gas-fired components within this emissions unit is 16.3 mmBtu/hr, calculated as the sum of the 4.8 mmBtu/hr and 2.5 mmBtu/hr heating tubes in the cleaning/surface-prep system, the 3.5 mmBtu/hr drying oven, and the 5.5 mmBtu/hr bake oven. The maximum natural gas usage rate is calculated as follows:

$$(16.3 \text{ mmBtu/hr}) \div (1020 \text{ Btu/scf}_{\text{GAS}}) = 0.016 \times 10^6 \text{ scf}_{\text{GAS}}/\text{hr}$$

The Emission Factor for total particulate matter from natural gas combustion is 7.6 lb per 10^6 scf (Reference: U.S. EPA, AP-42 Table 1.4-2.) So the potential-to-emit is calculated as follows:

$$(0.016 \times 10^6 \text{ scf}_{\text{GAS}}/\text{hr}) \times (7.6 \text{ lb}_{\text{PE}}/10^6 \text{ scf}_{\text{GAS}}) = 0.122 \text{ lb}_{\text{PE}}/\text{hr}$$

g) Miscellaneous Requirements

- (1) Although there are other existing emissions units subject to 40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture) operating at the facility where this emissions unit is located, this emissions unit itself is exempt from the requirements of Subpart RRRR per 40 CFR 63.4881(c)(1) because it is a source that uses only coatings, thinners, and cleaning materials that contain no organic HAP.