Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/26/2012

Certified Mail

Facility ID: 1576050866
Permit Number: P0106589
County: Stark

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

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain 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 Title V permit 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

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Canton City Health Department

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Title V Permit
for
Republic Storage Systems LLC

Facility ID:	1576050866
Permit Number:	P0106589
Permit Type:	Renewal
Issued:	6/26/2012
Effective:	7/17/2012
Expiration:	7/17/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Republic Storage Systems LLC

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Authorization

Facility ID: 1576050866
Facility Description: Steel Locker & Steel Metal Storage manufacturer
Application Number(s): A0039490, A0040811, A0043596
Permit Number: P0106589
Permit Description: Title V Renewal for a Steel Locker & Steel Metal Storage manufacturer including 3 coating lines with multiple paint booths, NG heaters & ovens, 1 dip coat water based line with multiple tanks, NG heaters & ovens, and 1 powder coat line with full enclosure. Also incorporates recently issued TVPTI P0108851 and 40 CFR Part 63, Subpart RRRR.
Permit Type: Renewal
Issue Date: 6/26/2012
Effective Date: 7/17/2012
Expiration Date: 7/17/2017
Superseded Permit Number: P0101216

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

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

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Canton City Health Department. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Canton City Health Department.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; ora combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b) 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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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.

2. The following insignificant emissions units at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21 and 40 CFR, Part 60 or 63:

   a) None.

3. The following emissions units in this permit are subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart RRRR, Maximum Achievable Control Standards (MACT): K001, K002, K006 and K007. The complete NESHAP/MACT requirements, including the NESHAP/MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

C. Emissions Unit Terms and Conditions

1. K002, 732 dip

Operations, Property and/or Equipment Description:

Metal furniture dip coating line, Dept. 732: Includes pre-clean 5-stage cleaning/rinse system; three (3) dip tanks, only one (1) in use at a time; and 2 natural gas ovens.

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 3745-21-09(I)	The volatile organic compound (VOC) content of each coating employed shall not exceed 3.0 lbs of VOC per gallon of coating, excluding water and exempt solvents.
b.	40 CFR Part 63, Subpart RRRR (40 CFR 63.4880 to 63.4981) In accordance with 40 CFR 63.4881(a) & (b) and 63.4882(a), (b) & (e), this emissions unit is an existing unit located at a major source of HAPs from surface coating of metal furniture.	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart RRRR. See b)(2)a.-c.

(2) Additional Terms and Conditions

a. Pursuant to 40 CFR Parts 63.4882(e) and 63.4890(c), this emissions unit is an existing affected source and, as such, the permittee shall limit organic HAP emissions to the atmosphere to no more than 0.10 kg organic HAP per liter (0.83 lb/gal) of coating solids used during each compliance period, determined according to the procedures in 40 CFR Part 63.4941.

b. Pursuant to 40 CFR Part 63.4891, the permittee must include all coatings, thinners, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit specified in term (2)a. above. To make this determination, the

permittee has elected to follow the compliant material option specified in 40 CFR Part 63.4891(a). To employ this option, the permittee must meet all the requirements of 40 CFR Part 63.4940, 63.4941 and 63.4942 as detailed in term f) below and demonstrate that each thinner and each cleaning material used contains no organic HAP.

c. Pursuant to 40 CFR Part 63.4942, the permittee must document continuous compliance with the emission limitations by an affirmative statement that the coating operation or group of coating operations was in compliance with the emission limitations during each reporting period because the permittee used no coating for which the organic HAP content exceeded the applicable emission limit in term (2)a. above, and the permittee used no thinner or cleaning material that contained organic HAP.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart RRRR]

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having elected to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the VOC content in pounds/gallon (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. records for all coatings, thinners, and cleaning materials used that identify whether the compliant material option was used. If there were no deviations, the permittee shall include an affirmative statement that each coating operation was in compliance with the emissions limitations during the reporting period because no coatings were employed for which the organic HAP content exceeded the applicable emissions limit in b)(2)a. above, and no thinners or cleaning materials were employed that contained organic HAP.

[Authority for term: OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart RRRR]

(2) The permittee shall comply with the following monitoring and recordkeeping requirements identified in 40 CFR Part 63, Subpart RRRR:

Applicable Rule	Requirement
40 CFR 63.4930(a)	Copy of notification reports

40 CFR 63.4930(b)	Copy of current supplier's specification, formulation data and test method results
40 CFR 63.4930(c)(1)	Operation and usage data
40 CFR 63.4930(c)(2) and 40 CFR 63.4941(d)	Calculation of the organic HAP content for each coating, using Equation 2 of 63.4941
40 CFR 63.4930(d)	Record of name and volume of each coating, thinner, and cleaning material used during each compliance period
40 CFR 63.4930(e) and 63.4941(a)(4)-(5)	Records of the mass fraction of organic HAP for each coating, thinner and cleaning material used during each compliance period
40 CFR 63.4930(f) and 63.4941(b)	Records of the volume fraction of coating solids for each coating used during each compliance period
40 CFR 63.4930(g) and 63.4941(c)	Records of the density of each coating used during each compliance period
40 CFR 63.4930(j) and 63.4920(a) – (d)	Continuing recordkeeping for each monthly compliance period as demonstrated above
40 CFR 63.4931	Records retention for at least 5 years, and a minimum of 2 years on site

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart RRRR]

e) Reporting Requirements

(1) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

(2) Reporting shall be performed in accordance with the following applicable requirements identified in 40 CFR Part 63, Subpart RRRR:

Applicable Rule	Requirement
40 CFR 63.4910	Submit all reports that apply by required dates in Table 2, General Provisions
40 CFR 63.4920(a)(1), (a)(2), and (a)(3)(i) – (iv) and (a)(4) –(5)	Submit the semiannual compliance report.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart RRRR]

(3) The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-21-09(B)(3)(g)]

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:

The volatile organic compound (VOC) content of each coating employed shall not exceed 3.0 lbs of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the records specified in section d)(1). Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC content of the coatings employed.

[Authority for term: OAC rules 3745-21-10(B)(4) and 3745-77-07(C)(1)]

b. Emission Limitation:

The permittee shall limit organic HAP emissions to the atmosphere to no more than 0.10 kg organic HAP per liter (0.83lb/gal) of coating solids used during each compliance period.

Applicable Compliance Method:

Compliance with the organic HAP limitation shall be demonstrated by meeting all the following compliant material option applicable requirements specified in 40 CFR Part 63, Subpart RRRR.

Applicable Rule	Requirement
40 CFR 63.4940, 63.4941, and 63.4942	The permittee must continue to perform ongoing compliance demonstrations according to the requirements in 63.4941(e) based on the record keeping in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart RRRR]

g) Miscellaneous Requirements

(1) None.

2. 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 (PM_{10})

(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/PM_{10}* emissions from this emissions unit since the calculated annual emission rate for PE/PM_{10}* 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 (PM_{10}).

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.

[Authority for terms: OAC rule 3745-77-07(A)(1) and PTI P0108851]

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.

[Authority for terms: OAC rule 3745-77-07(A)(1) and PTI P0108851]

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.

[Authority for terms: OAC rule 3745-77-07(C)(1) and PTI P0108851]

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 Part A: Standard Terms and Conditions of this permit.

[Authority for terms: OAC rule 3745-77-07(C)(1) and PTI P0108851]

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. <u>Emission Limitation:</u>

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 (PM_{10}).

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.

<u>Applicable Compliance Method:</u>

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 lb/hr) x (1 – 0.40) x (1 – 0.999) = 0.024 lb_{PE}/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 lb_{PE}/hr) x (8760 hr/yr) ÷ (2000 lb/ton) = 0.105 ton_{PE}/yr, rounded to 0.11 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:

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

[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. <u>Emission Limitation – for informational purposes only:</u>

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:

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

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

$$(0.016 \times 10^6 scf_{GAS}/hr) \times (7.6\ lb_{PE}/10^6 scf_{GAS}) = 0.122\ lb_{PE}/hr$$

[Authority for terms: OAC rule 3745-77-07(C)(1) and PTI P0108851]

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.

3. Emissions Unit Group -Paint Spray Booths- K001, K006 and K007

EU ID	Operations, Property and/or Equipment Description
K001	Metal furniture coating line, Dept. 731: Includes pre-clean 5-stage cleaning/rinse system; four (4) paint spray booths for high solids bake coating: #1 and #2 are auto spray, 3 gun maximum per booth; #3 and #4 are hand spray, 1 gun maximum per booth; 4 – 1.5 mmBtu/hr natural gas air heaters and 2 natural gas ovens. Surface coating process emissions are controlled by a dry exhaust filtration system.
K006	Metal furniture coating line, Dept. 732: Includes pre-clean 5-stage cleaning/rinse system; four (4) paint spray booths for high solids bake coating: #1 and #2 are hand spray, 4 gun and 1 gun maximum per booth; #3 and #4 are auto spray, 4 gun maximum per booth; one (1) 8.336 mmBtu/hr natural gas air heater and 2 natural gas ovens. Surface coating process emissions are controlled by a dry exhaust filtration system.
K007	Metal furniture coating line, Dept. 711: Includes pre-clean 5-stage cleaning/rinse system; three (3) paint spray booths: #1, #2, and #3 are hand spray, 1 gun maximum per booth; and 2 natural gas ovens. Surface coating process emissions are controlled by a dry exhaust filtration system.

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 3745-21-09(I)	The volatile organic compound (VOC) content of each coating employed shall not exceed 3.0 lbs of VOC per gallon of coating, excluding water and exempt solvents.
b.	OAC rule 3745-17-11(C)	The permittee shall comply with the control measure and work practice requirements of this rule. See c), d)(2)-(7), and e)(4)a.
c.	40 CFR Part 63, Subpart RRRR (40 CFR 63.4880 to 63.4981) In accordance with 40 CFR	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart RRRR.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	63.4881(a) & (b) and 63.4882(a), (b) & (e), each emissions unit is an existing unit located at a major source of HAPs from surface coating of metal furniture.	See b)(2)a.-c.

(2) Additional Terms and Conditions

a. Pursuant to 40 CFR Parts 63.4882(e) and 63.4890(c), each emissions unit is an existing affected source and, as such, the permittee shall limit organic HAP emissions to the atmosphere to no more than 0.10 kg organic HAP per liter (0.83 lb/gal) of coating solids used during each compliance period, determined according to the procedures in 40 CFR Part 63.4941.

b. Pursuant to 40 CFR Part 63.4891, the permittee must include all coatings, thinners, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit specified in term (2)a. above. To make this determination, the permittee has elected to follow the compliant material option specified in 40 CFR Part 63.4891(a). To employ this option, the permittee must meet all the requirements of 40 CFR Part 63.4940, 63.4941 and 63.4942 as detailed in term f) below and demonstrate that each thinner and each cleaning material used contains no organic HAP.

c. Pursuant to 40 CFR Part 63.4942, the permittee must document continuous compliance with the emission limitations by an affirmative statement that the coating operation or group of coating operations was in compliance with the emission limitations during each reporting period because the permittee used no coating for which the organic HAP content exceeded the applicable emission limit in term (2)a. above, and the permittee used no thinner or cleaning material that contained organic HAP.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart RRRR]

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(A)(1), 3745-17-11(C)(1) and (2)(b)]

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: OAC rule 3745-77-07(A)(1) and 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having elected to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for each emissions unit:

a. the name and identification number of each coating, as applied;

b. the VOC content, in pounds/gallon (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. records for all coatings, thinners and cleaning materials used that identify whether the compliant material option was used. If there were no deviations, the permittee shall include an affirmative statement that each coating operation was in compliance with the emissions limitations during the reporting period because no coatings were employed for which the organic HAP content exceeded the applicable emissions limit in b)(2)a. above, and no thinners or cleaning materials were employed that contained organic HAP.

[Authority for term: OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart RRRR]

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter system, along with documentation of any modifications deemed necessary by the permittee.

[Authority for term: OAC 3745-17-11(C)(2)(a) and 3745-77-07(C)(1)]

(3) The permittee shall conduct periodic inspections of the dry particulate filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals, with any modifications deemed necessary by the permittee. These periodic inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

[Authority for term: OAC rule 3745-17-11(C)(2)(c) and 3745-77-07(C)(1)]

(4) In addition to these 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 operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-17-11(C)(2)(c) and 3745-77-07(C)(1)]

(5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system, and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

[Authority for term: OAC rule 3745-17-11(C)(2)(d) and 3745-77-07(C)(1)]

(6) The permittee shall maintain records that document any time periods when the dry particulate filter system was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter system was not operated according to the manufacturer’s recommendations with any documented modifications made by the permittee.

[Authority for term: OAC rule 3745-17-11(C)(2)(e), (f), and (g); and 3745-77-07(C)(1)]

(7) The permittee shall maintain the records required by terms d)(1) through d)(6) above at the facility for a period of not less than five years, and these records shall be made available to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(a) and (c)-(g); and 3745-77-07(C)(1)]

(8) The permittee shall comply with the following monitoring and record keeping requirements identified in 40 CFR Part 63, Subpart RRRR:

Applicable Rule	Requirement
40 CFR 63.4930(a)	Copy of notification reports
40 CFR 63.4930(b)	Copy of current supplier’s specification, formulation data and test method results
40 CFR 63.4930(c)(1)	Operation and usage data
40 CFR 63.4930(c)(2) and 40 CFR 63.4941(d)	Calculation of the organic HAP content for each coating, using Equation 2 of 63.4941

40 CFR 63.4930(d)	Record of name and volume of each coating, thinner, and cleaning material used during each compliance period
40 CFR 63.4930(e) and 63.4941(a)(4)-(5)	Records of the mass fraction of organic HAP for each coating, thinner and cleaning material used during each compliance period
40 CFR 63.4930(f) and 63.4941(b)	Records of the volume fraction of coating solids for each coating used during each compliance period
40 CFR 63.4930(g) and 63.4941(c)	Records of the density of each coating used during each compliance period
40 CFR 63.4930(j) and 63.4920(a) – (d)	Continuing record keeping for each monthly compliance period as demonstrated above
40 CFR 63.4931	Records retention for at least 5 years, and a minimum of 2 years on site

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart RRRR]

e) Reporting Requirements

(1) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. 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.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

(2) Reporting shall be performed in accordance with the following applicable requirements identified in 40 CFR Part 63, Subpart RRRR:

Applicable Rule	Requirement
40 CFR 63.4910	Submit all reports that apply by required dates in Table 2, General Provisions
40 CFR 63.4920(a)(1), (a)(2), and (a)(3)(i) – (iv) and (a)(4) –(5)	Submit the semiannual compliance report.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart RRRR]

(3) The permittee shall notify the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-21-09(B)(3)(g)]

(4) 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.

[Authority for term: OAC rule 3745-77-07(C)(1), 3745-15-03(B)(1)(a) and 3745-15-03(C)]

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. <u>Emission Limitation:</u>

The volatile organic compound (VOC) content of each coating employed shall not exceed 3.0 lbs of VOC per gallon of coating, excluding water and exempt solvents.

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated based upon the records specified in section d)(1). Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC content of the coatings employed.

[Authority for term: OAC rules 3745-21-10(B)(4) and 3745-77-07(C)(1)]

b. <u>Emission Limitation:</u>

The permittee shall limit organic HAP emissions to the atmosphere to no more than 0.10 kg organic HAP per liter (0.83lb/gal) of coating solids used during each compliance period.

<u>Applicable Compliance Method</u>:

Compliance with the organic HAP limitation shall be demonstrated by meeting all the following compliant material option applicable requirements specified in 40 CFR Part 63, Subpart RRRR.

Applicable Rule	Requirement
40 CFR 63.4940, 63.4941, and 63.4942	The permittee must continue to perform ongoing compliance demonstrations according to the requirements in 63.4941(e) based on the record keeping in d)(8).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart RRRR]

g) Miscellaneous Requirements

(1) None.