



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
WARREN COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-05566**

**DATE: 6/10/2004**

Ernst Furniture Service, Inc.  
Gregory Ernst  
2247 Montgomery Road  
Maineville, OH 45039-0000

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

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

HCDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: 6/10/2004  
Effective Date: 6/10/2004**

**FINAL PERMIT TO INSTALL 14-05566**

Application Number: 14-05566  
APS Premise Number: 1483080449  
Permit Fee: **\$200**  
Name of Facility: Ernst Furniture Service, Inc.  
Person to Contact: Gregory Ernst  
Address: 2247 Montgomery Road  
Maineville, OH 45039-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2247 Montgomery Road  
Maineville, Ohio**

Description of proposed emissions unit(s):  
**Installation of a wood furniture stripping operation using a methylene chloride based wood stripper.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described 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

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

#### 3. Records Retention Requirements

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.

#### 4. 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.

**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 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).

**6. 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.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

**Ernst Furniture Service, Inc.**  
**PTI Application: 14-05566**  
**Issued: 6/10/2004**

**Facility ID: 1483080449**

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

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

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. 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 this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	3.61

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Overflow wood furniture stripping operation with methylene chloride based wood stripper	OAC rule 3745-31-05(A)(3)	111 lbs OC emissions/day 3.61 TPY OC emissions  See terms and conditions A.2.a., B.1. through B.4.
	OAC rule 3745-21-07(G)	Exempt from requirements; see Term B.3.

**2. Additional Terms and Conditions**

- 2.a The organic compound (OC) content of each stripping material employed in this emissions unit shall not exceed 9.92 lbs OC per gallon.
- 2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by prohibiting the use of photochemically reactive materials, compliance with the stripping material usage and OC content limitations and compliance with the OC emissions limitations.

**B. Operational Restrictions**

- 1. The maximum daily usage of stripping material for emissions unit P001 shall not exceed 15 gallons per day.
- 2. The maximum annual usage of stripping material for emissions unit P001 shall not exceed 975 gallons per year.
- 3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) is

prohibited.

4. The containers holding stripping material or stripping material waste shall always be closed during storage, except when material is added or removed. In addition, the containers shall not be handled, opened or stored in a manner that may cause them to leak.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for emissions unit P001:
  - a. the name and identification number of each stripping material;
  - b. the volume in gallons, as applied, of each stripping material employed;
  - c. the OC content of each stripping material employed, in pounds OC per gallon of stripping material, as applied;
  - d. a record for each liquid organic material employed, indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5); and
  - e. the total OC emissions as calculated in term E.1.
2. The permittee shall maintain a copy of the latest analysis of the stripping material waste that is sent off-site for disposal. The analysis shall include the chemical composition of the waste stripping compound including the quantity, the methylene chloride content and the solids content.

### **D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the use of a stripping material that exceeds the OC content limitation in term and condition A.2.a, or of any daily record showing an exceedance of the stripping material usage limitation in term and condition B.1. The notification shall include a copy of such

record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after any exceedance occurs.

3. The permittee shall submit annual reports which specify the annual stripping material usage and the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Emissions Limitations

111 lbs OC emissions/day  
3.61 TPY OC emissions

##### Applicable Compliance Methods

Compliance with the OC emissions limitations shall be demonstrated by material balance calculations. In the case of emissions of methylene chloride from the stripping compound, the permittee may apply a creditable adjustment factor, identified as the Waste Credit Factor, for the methylene chloride retained in the waste stripping material sent off-site for disposal. The Waste Credit Factor shall be calculated from the records of the latest chemical composition analysis of the stripping material waste. The permittee shall assume that any other organic compounds in the stripping material are emitted to the air at 100%, unless testing proves otherwise. The total OC emissions shall be the sum of the methylene chloride emissions and the emission of the other organic compound contents in the stripping material.

daily methylene chloride emissions:

$$\text{OC content (lb methylene chloride/lb stripping material)} \times \text{coating density (lb stripping material/gal stripping material)} \times \text{Waste Credit Factor} \times \text{actual usage (gal stripping material/day)} = \text{lbs methylene chloride emissions/day}$$

daily other (non-methylene chloride) organic compound emissions:

$$\text{OC content (lb non-methylene chloride OC/lb stripping material)} \times \text{coating density (lb stripping material/gal stripping material)} \times \text{actual usage (gal stripping material/day)} = \text{lbs non-methylene chloride OC emissions/day}$$

annual methylene chloride emissions:

OC content (lb methylene chloride/lb stripping material) x coating density (lb stripping material/gal stripping material) x Waste Credit Factor x actual usage (gal stripping material/year) x Ton/2000 lbs = TPY methylene chloride emissions

annual remaining organic compound emissions:

OC content (lb non-methylene chloride OC/lb stripping material) x coating density (lb stripping material/gal stripping material) x actual usage (gal stripping material/year) x Ton/2000 lbs = TPY non-methylene chloride OC emissions

2. Emissions Limitations  
9.92 lbs OC per gallon stripping material

Applicable Compliance Method

Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings.

3. The permittee shall have the waste stripping material analyzed for the chemical composition in order to determine the solids content and methylene chloride content in the waste that is sent off-site for disposal. This analysis is to certify the Waste Credit Factor (See term and condition E.1) for methylene chloride that is retained in the waste. This one time analysis shall be conducted using USEPA Reference Method 24 or an appropriate substitute ASTM Method.
4. Compliance with the usage limitations in terms and conditions B.1 and B.2 shall be demonstrated by the record keeping in terms and conditions in C.1.
5. Compliance with the operational restriction in term and condition B.3 shall be demonstrated by the record keeping in terms and conditions in C.1.

## F. Miscellaneous Requirements

None