



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 02-22758**

**Fac ID: 0238000222**

**DATE: 9/4/2007**

Erbs Finishing  
Steven Erb  
3815 State Route 39  
Millersburg, OH 44654

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 of the Director is final 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 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

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NEDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 9/4/2007  
Effective Date: 9/4/2007**

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**FINAL PERMIT TO INSTALL 02-22758**

Application Number: 02-22758  
Facility ID: 0238000222  
Permit Fee: **\$200**  
Name of Facility: Erbs Finishing  
Person to Contact: Steven Erb  
Address: 3815 State Route 39  
Millersburg, OH 44654

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**3815 State Route 39  
Millersburg, Ohio**

Description of proposed emissions unit(s):  
**Modification to PTI 02-22709 to change the stack exhaust from vertical to horizontal and to limit the operating hours.**

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

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Chris Korleski  
Director

**Erbs Finishing**  
**PTI Application: 02-22758**  
**Issued: 9/4/2007**

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## **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 (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.)

#### **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

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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)**

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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 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.

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**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.

**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>
VOC	24.99

Emissions Unit ID: R001

**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.

**Operations, Property, and/or Equipment - (R001) - Wood furniture coating operation consisting of manual spray gun/pump, coating booth with dry overspray filters. Parts manually moved and air dried.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c, A.2.d, B.1 and B.2 below.  The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.

**2. Additional Terms and Conditions**

- 2.a On any day during which any photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all the coatings and photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pound per day. [OC emissions from any cleanup material that is not a photochemically reactive material shall not be counted towards the 8 lbs/hr and 40 lbs/day limitations.]
- 2.b On any day during which no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the volatile organic compound (VOC) emissions from all the coatings shall not exceed 20.99 pounds per hour. [This limit is based upon the maximum application rate of 3.3 gallon per hour.]
- 2.c The VOC content of each coating shall not exceed 6.36 pounds per gallon, as applied.
- 2.d The VOC emissions from all coatings and cleanup materials from this emissions unit shall not exceed 24.99 tons per year.

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**B. Operational Restrictions**

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The maximum weekly operating hours for this emissions unit shall not exceed 123.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day during which any photochemically reactive material is employed in this emissions unit:
  - a. The company identification for each coating and photochemically reactive cleanup material employed;
  - b. The number of gallons of each coating and photochemically reactive cleanup material employed minus the number of gallons of each coating and photochemically reactive cleanup material recovered for disposal;
  - c. The OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
  - d. The total emissions rate for all the coatings and photochemically reactive cleanup materials, in pounds OC per day;
  - e. The total number of hours the emissions unit was in operation; and
  - f. The average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
  - g. The VOC content of each coating and photochemically reactive cleanup material, in pounds VOC per gallon; and
  - h. The total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds VOC per day.

[Note: The coating information must be for the coatings as employed, including

Emissions Unit ID: **R001**

any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for each day during which no photochemically reactive materials are employed in this emissions unit:
  - a. The company identification for each coating or cleanup material employed;
  - b. Documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
  - c. The volatile organic compound (VOC) content of each coating, in lbs/gallon, as applied;
  - d. The number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
  - e. The total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
  - f. The total number of hours the emissions unit was in operation; and
  - g. The average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.
4. The permittee shall collect and record the following information for each month for the emissions unit:
  - a. The number of gallons of each non-photochemically reactive cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
  - b. The volatile organic compound (VOC) content of each non-photochemically reactive cleanup material, in lbs/gallon; and
  - c. The total VOC emissions from all non-photochemically reactive cleanup materials employed, in lbs/month, i.e., sum of (b) times (a).
5. The permittee shall calculate and record the total VOC emissions from all the coatings and cleanup materials employed, in tons per calendar year; [i.e., (the summation of the daily VOC emissions, from section C.2.h, for the calendar year + the summation of the

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daily VOC emissions, from section C.3.e, for the calendar year + the monthly non-photochemically reactive cleanup material VOC emission from section C.4.c) divided by 2000 lbs/ton].

6. The permittee shall maintain weekly records of the operating hours for this emissions unit.
7. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4

Maximum Hourly Emission Rate (lbs/hr): 1.19

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4,833

Adjusted MAGLC (ug/m<sup>3</sup>): 6,167

8. Prior to making any physical changes to or changes in the method of operation of the emissions unit), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC

Emissions Unit ID: **R001**

3745-114-01, that was modeled from the initial (or last) application; and

- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

9. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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**D. Reporting Requirements**

1. The permittee shall notify the Director in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
2. The permittee submit quarterly deviation (excursion) reports that identify:
  - a. For the days during which any photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such day;
  - b. For the days during which no photochemically reactive materials were employed, each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day; and
  - c. Each day during which the VOC content of any coating exceeded the pounds per gallon limitation, and the actual VOC content of each such coating employed.

The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. The permittee shall also submit annual reports that summarize:
  - a. the actual annual emissions of VOC from this emissions unit;
  - b. any changes made to a parameter or value used in the dispersion model used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.; and
  - c. any exceedances of the weekly operating hours limitation, as well as the corrective actions that were taken to achieve compliance.

This report shall be postmarked or delivered no later than January 31 following

the end of each calendar year.

## **E. Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:  
8 pounds per hour of OC emissions for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be determined based upon the record keeping requirements specified in Section C.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emissions Limitation:  
40 pounds per day of OC emissions for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined based upon the record keeping requirements specified in Section C.2 of this permit.

- c. Emissions Limitation:  
20.99 pounds VOC emissions per hour for each day during which no photochemically reactive materials are employed

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in Section C.3 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

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- d. Emissions Limitation:  
24.99 tons per year of VOC emissions from all coatings and cleanup materials from this emissions unit

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Sections C.2, C.3, C.4 and C.5 of this permit.

- e. Emissions Limitation:  
6.36 pounds of VOC per gallon coating, as applied.

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by a certified environmental data sheet supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

**F. Miscellaneous Requirements**

None