



State of Ohio Environmental Protection Agency

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

Permit No. 01-8023  
**RE: PERMIT TO INSTALL REGISTRATION**  
**Terms and Conditions**  
**FRANKLIN COUNTY**  
**Application No: 01-8023**

**CERTIFIED MAIL**

**DATE: August 11, 1999**

Select Seating Division  
Charles W Gray  
2300 Lockbourne Road  
Columbus, OH 43212

Enclosed please find an Ohio EPA Permit to Install Registration which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit registration 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 with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: DAPC, CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY  
**PERMIT TO INSTALL REGISTRATION**

Application Number:

01-8023  
APS Premise Number: 0125042413  
Permit Fee: **\$150**  
Name of Facility: Select Seating Division  
Person to Contact: Charles W Gray  
Address: 2300 Lockbourne Road  
Columbus, OH 43212

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**826 East Jenkins Avenue**  
**Columbus, Ohio**

Description of proposed emissions unit(s):  
**SPRAY BOOTH FOR APPLICATION OF COATING ON WOOD FURNITURE.**

Date of Issuance: August 11, 1999  
Effective Date: August 11, 1999

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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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 Related to Monitoring and Recordkeeping 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

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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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**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**

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### **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 thirty (30) 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	1.5

**PART II: SPECIAL TERMS AND CONDITIONS**

**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>
Spray Booth for Furniture Coating	OAC rule 3745-31-05	Organic compound emissions from employment of non-photochemically reactive materials (non-PRMs) shall not exceed 8 pounds per hour.
	OAC rule 3745-21-07(G)(2)	Total organic compound emissions from non-PRMs and PRMs shall not exceed 1.5 tons per year, including cleanup materials. See B.2. and B.3.
		Particulate matter in over spray shall be vented through a dry filter. See B.1.
		Organic compound (OC) emissions from employment of photochemically reactive materials PRMs shall not exceed 8 pounds per hour and 40 pounds per day including cleanup materials.

**2. Additional Terms and Conditions**

- 2.a The 8 lbs OC/hr limit for non-PRMs was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

**B. Operational Restrictions**

- 1. This emissions unit will be operated and maintained in accordance with manufacturers

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Emissions Unit ID: R001

recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufactures recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

2. The maximum monthly coating usage shall not exceed 40 gallons
3. The maximum monthly cleanup material usage shall not exceed 10 gallons with 50% recovery of used solvent for off-site shipment.

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

1. The permittee shall collect and record the following information for each day for the coating operation:
  - 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.
  - c. The OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon.
  - d. For each day during which a photochemically reactive material is employed, the total emission rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day.
  - e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.
  - f. For each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

**D. Reporting Requirements**

- 1 In accordance with paragraph A. 2. b. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports of the following:
  - a. monthly coating usage;
  - b. any periods of operation without the exhaust filters; and,
  - c. any period of time that the exhaust filters were not maintained.
  - d. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - e. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

**E. Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
8 pounds per hour of OC  
  
Applicable Compliance Method:  
  
Compliance shall be based upon the record keeping specified in Section C.
  - b. Emission Limitation:  
  
40 pounds per day of OC  
  
Applicable Compliance Method:

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Emissions Unit ID: **R001**

Compliance shall be based upon the record keeping specified in Section C.

c. Emission Limitation:

1.5 tons per year of OC

Applicable Compliance Method:

$(480 \text{ gallon coating} * 5.66 \text{ lb OC/gallon}) + (120 \text{ gallon thinner} * 6.63 \text{ lbs/gallon} * 0.5) = 1.5 \text{ ton OC/yr}$ , assuming 50% recovery of (thinner/cleanup) used solvent for off-site shipment.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

#### **F. Miscellaneous Requirements**

1. Air Toxic Policy Clarifying Language

Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the emission unit.