

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **03-17077**

**A. Source Description**

This facility manufactures wood cabinets and furniture and has four air pollution emissions sources: three spray booths (R001, R002, and R003) and one wood waste handling operation (P001) which includes sawing, planing, molding, sanding and routing with a custom cyclone and baghouse. Two of the spray booths (R001 and R002) and the wood waste handling operation were installed in 1986. The third spray booth (R003) was just installed in the summer of 2005.

**B. Facility Emissions and Attainment Status**

Volatile organic compounds (VOCs) and particulate emissions (PE) are emitted from this facility. The facility is a minor facility for Title V and MACT purposes. The facility is located in Erie County, which is in attainment for all criteria pollutants.

**C. Source Emissions**

Organic compound (OC) emissions from the spray booth operations are applicable to OAC rule 3745-21-07(G)(2) limiting OC's to 8 lbs/hr and 40 lbs/day. OAC rule 3745-21-07(G)(2) is contained in Ohio's SIP resulting in a federally enforceable potential to emit limitation of 40 lbs/day for each spray booth. Based on the 40 lbs/day limitation, the facility is a minor facility for MACT purposes with the maximum hazardous air pollutant (HAP) emissions for the facility being 8 tons/yr of a single HAP and 16 tons/yr of combined HAPs. Despite, currently being considered a minor facility for HAPs, the company has requested federally enforceable limitations of 9.9 tons/yr of an individual HAP and 24.9 tons/yr of combined HAPs to allow for the possible future use of coatings containing higher amounts of HAPs.

**D. Conclusion**

The establishment of synthetic minor limitations for individual and combined HAPs will allow the facility to maintain its current minor status for MACT and Title V while providing flexibility in the future to use coatings with greater HAP contents.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
RICHLAND COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 03-17077**

**Fac ID: 0370010198**

**DATE: 4/11/2006**

Rod Schag Inc. (The Countertop Shop)  
Mark Schag  
132 Distl Avenue  
Mansfield, OH 44902

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

NWDO

Richland County Regional Planning Commission

**RICHLAND COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-17077 FOR AN AIR CONTAMINANT SOURCE FOR  
Rod Schag Inc. (The Countertop Shop)**

On 4/11/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Rod Schag Inc. (The Countertop Shop)**, located at **132 Distl Avenue, Mansfield, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17077:

**3 paint booths and a wood cabinet manufacturing line.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402  
[(419)352-8461]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 03-17077**

Application Number: 03-17077  
Facility ID: 0370010198  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Rod Schag Inc. (The Countertop Shop)  
Person to Contact: Mark Schag  
Address: 132 Distl Avenue  
Mansfield, OH 44902

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**132 Distl Avenue  
Mansfield, Ohio**

Description of proposed emissions unit(s):  
**3 paint booths and a wood cabinet manufacturing line.**

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

Rod Schag Inc. (The Countertop Shop)  
PTI Application: 03-17077  
Issued: To be entered upon final issuance  
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0370010198

## **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,

**Rod Schag Inc. (The Countertop Shop)**

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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

**Rod Schag Inc. (The Countertop Shop)**

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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

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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

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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>
OC	22.14
PE	5.26
individual HAPs	9
combined HAPs	.
	9
	2
	4
	.
	9

10

**Rod 5**

**PTI A**

**Issued: To be entered upon final issuance**

Emissions Unit ID: **P001**

Rod 5  
PTI A

Emissions Unit ID: P001

Issued: To be entered upon final issuance

**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 - wood waste handling system with custom cyclone and baghouse	OAC rule 3745-31-05(A)(3)	5.26 tons particulate matter less than 10 microns in size (PM10)/year (See A.1.2.a)
		0.02 grains PM10/dry standard cubic foot (dscf)
		See A.1.2.b
		Opacity restrictions (See A.2.c).
	OAC rule 3745-17-11(B)	See A.2.d
	OAC rule 3745-17-07(A)	See A.2.e

**2. Additional Terms and Conditions**

- 2.a All emissions of particulate matter are PM10.
- 2.b The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a cyclone and baghouse achieving a maximum outlet concentration of 0.02 grains PM10/dscf.
- 2.c Visible particulate emissions shall not exceed 0% opacity as a six-minute average from any building opening.
- 2.d The uncontrolled mass rate of particulate emissions from this emissions unit is

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less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Erie county.

- 2.e** This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

## **B. Operational Restrictions**

None.

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

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from building egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit (stack emissions associated with this emissions unit are vented into the building). The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

## **D. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (b) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## **E. Testing Requirements**

1. Compliance with the emissions limitations in section A.1. of the terms and conditions of

Rod 5  
PTI A

Emissions Unit ID: P001

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this permit shall be determined in accordance with the following methods:

- a. Emissions Limitation: 0.02 gr PM10/dscf , 5.26 tons PM10/yr

Applicable Compliance Method: The 0.02 gr PM10/dscf limitation is the established maximum outlet concentration for the baghouse. The permittee shall demonstrate compliance with the ton/yr limitation by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, the baghouse's maximum volumetric air flow rate (7,000 acfm), 60 min/hr, and a maximum operating schedule of 8,760 hrs/yr. This value is then converted to ton/yr by multiplying by lb/7000 grains and ton/2000 lb.

If required, the permittee shall demonstrate compliance with the 0.02 gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- b. Emissions Limitation: Visible particulate emissions shall not exceed 0% opacity as a six-minute average from any building egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

Applicable Compliance Method: If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9.

**F. Miscellaneous Requirements**

None.

**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>
R001 - spray paint booth #1, with dry filtration	OAC rule 3745-31-05(A)(3)	coating operations: 2.75 lbs organic compounds (OC)/hr; 7.3 tons OC/yr (See A.2.a)
		clean-up operations: 13.18 lbs OC/month and 0.08 ton OC/yr (See B.1)
		See A.2.b.
	OAC 3745-31-05(C)	9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined (See A.2.c)
	OAC 3745-21-07(G)(2)	40.0 lbs OC/day from coating operations

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation represents the potential to emit of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method

**Rod 5****PTI A**Emissions Unit ID: **R001****Issued: To be entered upon final issuance**

calculations are required to demonstrate compliance with this limitation.

- 2.b** The requirements of this rule also include compliance with the requirement of OAC rule 3745-21-07(G)(2) that emissions of OC shall not exceed 40 lbs/day.
- 2.c** Annual HAP emissions from emissions units R001 through R003 combined shall not exceed 9.9 tons per rolling 12-month period for an individual HAP and 24.9 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months, and as such, the permittee has existing records to determine compliance upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit. required to demonstrate compliance with this limitation.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

**B. Operational Restrictions**

- 1. The use of photochemically reactive clean up materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

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

- 1. The permittee shall collect and record the following information each day for all coatings employed in this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the OC content of each coating, as applied, in pounds per gallon;
  - d. the OC emissions from each coating employed, in pounds (C.1.b. x C.1.c), in pounds;
  - e. the total OC emission rate for all coatings employed summation of C.1.d for all coatings), in pounds; and
  - f. the annual year to date OC emissions from coating operations, in tons per year

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(summation of C.3.e for each calendar month to date from January to December).

2. The permittee shall collect and record the following each month for cleanup operations in this emissions unit:
  - a. the name and identification of each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;
  - c. the OC content of each cleanup material employed, in pounds per gallon;
  - d. the number of gallons of each cleanup material employed;
  - e. the OC emissions from each cleanup material employed (C.3.c x C.3.d);
  - f. the total OC emissions from all cleanup materials employed (summation of C.3.e for all cleanup materials) in pounds or tons; and
  - g. the annual year to date OC emissions from cleanup operations, in tons per year (summation of C.3.f for each calendar month to date from January to December).
  
3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units R001 through R003 combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in pounds;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings and cleanup materials), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and

Rod Schag Inc. (The Countertop Shop)

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Emissions Unit ID: R001

cleanup materials employed (summation of C.3.e for all HAPs for all coatings and cleanup materials), in pounds;

- g. following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
4. The permit to install for emissions units R001 and R002 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-methyl 1-propanol (isobutyl alcohol)

TLV (mg/m<sup>3</sup>): 151.57

Maximum Hourly Emission Rate (lbs/hr): 5.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 818.01

MAGLC (ug/m<sup>3</sup>): 3608.80

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of

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Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the following:
  - a. all exceedances of the monthly OC emission limitation of 13.18 lbs OC/month from cleanup operations.

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Emissions Unit ID: R001

- b. all exceedances of the 40 lbs OC/day from coating operations.
- c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units R001, R002, and R003, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

- 2. The permittee shall submit annual reports that summarize the following;
  - a. the total actual OC emissions, in tons, from coating operations;
  - b. the total actual OC emissions, in tons, from cleanup operations.

The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

- 3. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of a photochemically reactive cleanup material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

## E. Testing Requirements

- 1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
2.75 lbs OC/hr; 7.3 tons OC/yr from coating operations

### Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 0.50 gallons per hour and a maximum OC content of 5.50 pounds per gallon.

**Rod 5**  
**PTI A**

Emissions Unit ID: **R001**

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Compliance with the annual OC emissions limitation shall be based upon the record keeping requirements specified in section C.1. of this permit.

- b. Emission Limitation:  
13.18 lbs OC/month and 0.08 tons OC/yr from cleanup operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

- c. Emission Limitation:  
9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

**F. Miscellaneous Requirements**

- 1. The terms and conditions contained in Part II, A.1 through E.1 are federally enforceable.

Rod 5  
PTI A

Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

**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>
R002 - spray paint booth #2, with dry filtration	OAC rule 3745-31-05(A)(3)	coating operations: 2.75 lbs organic compounds (OC)/hr; 7.3 tons OC/yr (See A.2.a)
		clean-up operations: 13.18 lbs OC/month and 0.08 ton OC/yr (See B.1)
		See A.2.b.
	OAC 3745-31-05(C)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined (See A.2.c)
	OAC 3745-21-07(G)(2)	40.0 lbs OC/day from coating operations

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation represents the potential to emit of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method

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calculations are required to demonstrate compliance with this limitation.

- 2.b The requirements of this rule also include compliance with the requirement of OAC rule 3745-21-07(G)(2) that emissions of OC shall not exceed 40 lbs/day.
- 2.c Annual HAP emissions from emissions units R001 through R003 combined shall not exceed 9.9 tons per rolling 12-month period for an individual HAP and 24.9 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months, and as such, the permittee has existing records to determine compliance upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit. required to demonstrate compliance with this limitation.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

## B. Operational Restrictions

- 1. The use of photochemically reactive clean up materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

## C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for all coatings employed in this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the OC content of each coating, as applied, in pounds per gallon;
  - d. the OC emissions from each coating employed, in pounds (C.1.b. x C.1.c), in pounds;
  - e. the total OC emission rate for all coatings employed summation of C.1.d for all coatings), in pounds; and
  - f. the annual year to date OC emissions from coating operations, in tons per year

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(summation of C.3.e for each calendar month to date from January to December).

2. The permittee shall collect and record the following each month for cleanup operations in this emissions unit:
  - a. the name and identification of each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;
  - c. the OC content of each cleanup material employed, in pounds per gallon;
  - d. the number of gallons of each cleanup material employed;
  - e. the OC emissions from each cleanup material employed (C.3.c x C.3.d);
  - f. the total OC emissions from all cleanup materials employed (summation of C.3.e for all cleanup materials) in pounds or tons; and
  - g. the annual year to date OC emissions from cleanup operations, in tons per year (summation of C.3.f for each calendar month to date from January to December).
  
3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units R001 through R003 combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in pounds;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings and cleanup materials), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and

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cleanup materials employed (summation of C.3.e for all HAPs for all coatings and cleanup materials), in pounds;

- g. following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
4. The permit to install for emissions units R001 and R002 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-methyl 1-propanol (isobutyl alcohol)

TLV (mg/m3): 151.57

Maximum Hourly Emission Rate (lbs/hr): 5.5

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 818.01

MAGLC (ug/m3): 3608.80

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of

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Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the following:
  - a. all exceedances of the monthly OC emission limitation of 13.18 lbs OC/month from cleanup operations.

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- b. all exceedances of the 40 lbs OC/day from coating operations.
- c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units R001, R002, and R003, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall submit annual reports that summarize the following;
  - a. the total actual OC emissions, in tons, from coating operations;
  - b. the total actual OC emissions, in tons, from cleanup operations.

The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of a photochemically reactive cleanup material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

## E. Testing Requirements

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

- a. Emission Limitation:  
2.75 lbs OC/hr; 7.3 tons OC/yr from coating operations

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 0.50 gallons per hour and a maximum OC content of 5.50 pounds per gallon.

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Compliance with the annual OC emissions limitation shall be based upon the record keeping requirements specified in section C.1. of this permit.

- b. Emission Limitation:  
13.18 lbs OC/month and 0.08 tons OC/yr from cleanup operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

- c. Emission Limitation:  
9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

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

1. The terms and conditions contained in Part II, A.1 through E.1 are federally enforceable.

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PTI A

Emissions Unit ID: R003

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**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>
R003 - spray paint booth #3, with dry filtration	OAC rule 3745-31-05(A)(3)	coating operations: 2.54 lbs organic compounds (OC)/hr; 7.3 tons OC/yr (See A.2.a)  clean-up operations: 13.18 lbs OC/month and 0.08 ton OC/yr (See B.1)  See A.2.b.
	OAC rule 3745-31-05(C)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined (See A.2.c)
	OAC rule 3745-21-07(G)(2)	40.0 lbs OC/day from coating operations

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation represents the potential to emit of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method

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calculations are required to demonstrate compliance with this limitation.

- 2.b** The requirements of this rule also include compliance with the requirement of OAC rule 3745-21-07(G)(2) that emissions of OC shall not exceed 40 lbs/day.
- 2.c** Annual HAP emissions from emissions units R001 through R003 combined shall not exceed 9.9 tons per rolling 12-month period for an individual HAP and 24.9 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months, and as such, the permittee has existing records to determine compliance upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit. required to demonstrate compliance with this limitation.

Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

**B. Operational Restrictions**

- 1. The use of photochemically reactive clean up materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

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

- 1. The permittee shall collect and record the following information each day for all coatings employed in this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the OC content of each coating, as applied, in pounds per gallon;
  - d. the OC emissions from each coating employed, in pounds (C.1.b. x C.1.c), in pounds;
  - e. the total OC emission rate for all coatings employed summation of C.1.d for all coatings), in pounds; and
  - f. the annual year to date OC emissions from coating operations, in tons per year

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(summation of C.3.e for each calendar month to date from January to December).

2. The permittee shall collect and record the following each month for cleanup operations in this emissions unit:
  - a. the name and identification of each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;
  - c. the OC content of each cleanup material employed, in pounds per gallon;
  - d. the number of gallons of each cleanup material employed;
  - e. the OC emissions from each cleanup material employed (C.3.c x C.3.d);
  - f. the total OC emissions from all cleanup materials employed (summation of C.3.e for all cleanup materials) in pounds or tons; and
  - g. the annual year to date OC emissions from cleanup operations, in tons per year (summation of C.3.f for each calendar month to date from January to December).
  
3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units R001 through R003 combined:
  - a. the company identification of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in pounds;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.3.d for all coatings and cleanup materials), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all the coatings and

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cleanup materials employed (summation of C.3.e for all HAPs for all coatings and cleanup materials), in pounds;

- g. following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the following:
  - a. all exceedances of the monthly OC emission limitation of 13.18 lbs OC/month from cleanup operations.
  - b. all exceedances of the 40 lbs OC/day from coating operations.
  - c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons, respectively (for emissions units R001, R002, and R003, combined).

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall submit annual reports that summarize the following;
  - a. the total actual OC emissions, in tons, from coating operations;
  - b. the total actual OC emissions, in tons, from cleanup operations.

The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of a photochemically reactive cleanup material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1. of these terms and

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conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
2.54 lbs OC/hr; 7.3 tons OC/yr from coating operations

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 0.50 gallons per hour and a maximum OC content of 5.08 pounds per gallon.

Compliance with the annual OC emissions limitation shall be based upon the record keeping requirements specified in section C.1. of this permit.

- b. Emission Limitation:  
13.18 lbs OC/month and 0.08 tons OC/yr from cleanup operations

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Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

c. Emission Limitation:

9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units R001, R002, and R003 combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because 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 cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install. The installation of emissions unit R003 was a separate construction project from the installation of emissions units R001 and R002, therefore emissions unit R003 is not required to comply with the "Air Toxic Policy" as stated above.
2. The terms and conditions contained in Part II, A.1 through E.1 are federally enforceable.