

Facility ID: 1431483219 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit P001](#)
- [Go to Part II for Emissions Unit P002](#)
- [Go to Part II for Emissions Unit P003](#)
- [Go to Part II for Emissions Unit P004](#)
- [Go to Part II for Emissions Unit P005](#)

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Facility ID: 1431483219 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Varnish Kettle K-9 with thermal oxidizer	OAC 3745-35-07(B)(2) OAC 3745-21-07(G)(2)	See A.2. and B.1.-B.2. The emission limitations/control requirements specified in OAC 3745-21-07(G)(2) are less stringent than those established under 3745-35-07.

**2. Additional Terms and Conditions**

- (a) The combined annual emissions of organic compounds from emissions units P001-P005 shall not exceed 74.56 tons based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The organic compounds emitted during the first full calendar month after permit issuance shall be added to the organic compound emission total from the previous 11 months of operation to begin the rolling, 12-month summation.  
The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY as a rolling, 12-month summation for any single HAP and 25 TPY as a rolling, 12-month summation for any combination of HAPs. The HAPs emitted during the first full calendar month after permit issuance shall be added to the HAP emission totals from the previous 11 months of operation to begin the rolling, 12-month summation.  
All OC emissions from this emissions unit shall be vented directly (100% capture) to a thermal incinerator with a destruction efficiency of at least 96 percent by weight.

**B. Operational Restrictions**

1. The combined maximum annual production rate for emissions units P001-P005 shall not exceed 23,300 tons based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The production rate during the first calendar month after permit issuance shall be added to the total production rate from the previous 11 months of operation to begin the rolling, 12-month summation.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. For emission units P001-P005, the permittee shall collect and record the following information on a monthly basis:
- the total amount of varnish produced, in tons per month;
  - the OC emission rate, in tons per month;
  - the total HAP emission rate, in tons per month;
  - the speciated (individual) HAP emission rate, in tons per month;
  - the rolling, 12-month summation of varnish production, in tons;
  - the rolling, 12-month summation of OC emissions, in tons;
  - the rolling, 12-month summation of total HAP emissions, in tons; and
  - the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by line basis.

3. In addition to the emission information specified in C.2., the permittee shall collect and record the following information on a monthly basis for all emissions units at the facility:
- the total HAP emission rate, in tons per month;
  - the speciated (individual) HAP emission rate, in tons per month;
  - the rolling, 12-month summation of total HAP emissions, in tons; and
  - the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by line basis.

**D. Reporting Requirements**

- The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
- The permittee shall submit deviation (excursion) reports which identify any exceedences of the emission limitations and/or production limitation listed in A.2. or B.1.
- The permittee shall submit annual reports which specify the following information for the previous calendar year:
  - the total combined OC emissions from emissions units P001-P005;
  - the varnish production totals, in tons per year, for emissions units P001-P005;
  - the total HAP emission rate, in tons per year, from all emission units; and
  - the speciated (individual) HAP emission rate, in tons per year from all emission units.

These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

- The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - The emission testing shall be conducted within six-months of issuance of this permit, and within six months of expiration of this permit.
  - The emission testing shall be conducted to demonstrate compliance with the required OC destruction efficiency of 96% by weight.
  - The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement of 96 % by weight:
 

40 CFR, Part 60 Appendix A, Methods 1-5 and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or another approved test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations and production limitation specified in sections A. and B. of this permit shall be demonstrated by information found in monitoring and/or record keeping section C and the stack testing requirements specified in section E.1.
3. The following equation shall be used to calculate the monthly organic compound emission rate for P001-P005:  

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance})) / 2000]$$

\* Emission factor taken from AP-42, Fifth edition, Table 6.4-1 Uncontrolled Emission Factors for Varnish Manufacturing.
4. The following equation shall be used to calculate the monthly total HAP emission rate from P001-P005:  

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}) \times \text{the total HAP content, as a percent by weight, of the varnish produced}) / 2000]$$
5. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate(s) for emission units P001-P005:  

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}) \times \text{the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced}) / 2000]$$
6. The following equation shall be used to calculate the monthly total HAP emission rate for varnish manufacturing from emission units other than P001-P005:  

$$[(\text{Tons of varnish produced during the month} \times \text{Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing)} \times \text{the total HAP content, as a percent by weight, of the varnish produced}) / 2000]$$
7. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate for varnish manufacturing from emission units other than P001-P005:  

$$[(\text{Tons of varnish produced during the month} \times \text{Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing)} \times \text{the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced}) / 2000]$$

**F. Miscellaneous Requirements**

1. The terms and conditions in Sections A through F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

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Facility ID: 1431483219 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Varnish Kettle K-8 with thermal oxidizer	OAC 3745-35-07(B)(2) OAC 3745-21-07(G)(2)	See A.2. and B.1.-B.2. The emission limitations/control requirements specified in OAC 3745-21-07(G)(2) are less stringent than those established under 3745-35-07.

**2. Additional Terms and Conditions**

- (a) The combined annual emissions of organic compounds from emissions units P001-P005 shall not exceed 74.56 tons based on a rolling, 12-month summation. This rolling summation shall begin upon

issuance of this permit. The organic compounds emitted during the first full calendar month after permit issuance shall be added to the organic compound emission total from the previous 11 months of operation to begin the rolling, 12-month summation.

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY as a rolling, 12-month summation for any single HAP and 25 TPY as a rolling, 12-month summation for any combination of HAPs. The HAPs emitted during the first full calendar month after permit issuance shall be added to the HAP emission totals from the previous 11 months of operation to begin the rolling, 12-month summation.

All OC emissions from this emissions unit shall be vented directly (100% capture) to a thermal incinerator with a destruction efficiency of at least 96 percent by weight.

**B. Operational Restrictions**

1. The combined maximum annual production rate for emissions units P001-P005 shall not exceed 23,300 tons based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The production rate during the first calendar month after permit issuance shall be added to the total production rate from the previous 11 months of operation to begin the rolling, 12-month summation.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. For emission units P001-P005, the permittee shall collect and record the following information on a monthly basis:
  - a. the total amount of varnish produced, in tons per month;
  - b. the OC emission rate, in tons per month;
  - c. the total HAP emission rate, in tons per month;
  - d. the speciated (individual) HAP emission rate, in tons per month;
  - e. the rolling, 12-month summation of varnish production, in tons;
  - f. the rolling, 12-month summation of OC emissions, in tons;
  - g. the rolling, 12-month summation of total HAP emissions, in tons; and
  - h. the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by line basis.

3. In addition to the emission information specified in C.2., the permittee shall collect and record the following information on a monthly basis for all emissions units at the facility:
  - a. the total HAP emission rate, in tons per month;
  - b. the speciated (individual) HAP emission rate, in tons per month;
  - c. the rolling, 12-month summation of total HAP emissions, in tons; and
  - d. the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by line basis.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedences of the emission limitations and/or production limitation listed in A.2. or B.1.
3. The permittee shall submit annual reports which specify the following information for the previous calendar year:
  - a. the total combined OC emissions from emissions units P001-P005;
  - b. the varnish production totals, in tons per year, for emissions units P001-P005;
  - c. the total HAP emission rate, in tons per year, from all emission units; and
  - d. the speciated (individual) HAP emission rate, in tons per year from all emission units.

These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within six-months of issuance of this permit, and within six months of expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the required OC destruction efficiency of 96% by weight.

c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement of 96 % by weight:

40 CFR, Part 60 Appendix A, Methods 1-5 and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or another approved test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations and production limitation specified in sections A. and B. of this permit shall be demonstrated by information found in monitoring and/or record keeping section C and the stack testing requirements specified in section E.1.

3. The following equation shall be used to calculate the monthly organic compound emission rate for P001-P005:

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance})) / 2000]$$

\* Emission factor taken from AP-42, Fifth edition, Table 6.4-1 Uncontrolled Emission Factors for Varnish Manufacturing.

4. The following equation shall be used to calculate the monthly total HAP emission rate from P001-P005:

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}) \times \text{the total HAP content, as a percent by weight, of the varnish produced}) / 2000]$$

5. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate(s) for emission units P001-P005:

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}) \times \text{the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced}) / 2000]$$

6. The following equation shall be used to calculate the monthly total HAP emission rate for varnish manufacturing from emission units other than P001-P005:

$$[(\text{Tons of varnish produced during the month} \times \text{Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing)} \times \text{the total HAP content, as a percent by weight, of the varnish produced}) / 2000]$$

7. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate for varnish manufacturing from emission units other than P001-P005:

$$[(\text{Tons of varnish produced during the month} \times \text{Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing)} \times \text{the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced}) / 2000]$$

**F. Miscellaneous Requirements**

1. The terms and conditions in Sections A through F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

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Facility ID: 1431483219 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Varnish Kettle K-7 with thermal oxidizer	OAC 3745-35-07(B)(2) OAC 3745-21-07(G)(2)	See A.2. and B.1.-B.2. The emission limitations/control requirements specified in OAC 3745-21-07(G)(2) are less stringent than those established under 3745-35-07.

**2. Additional Terms and Conditions**

- (a) The combined annual emissions of organic compounds from emissions units P001-P005 shall not exceed 74.56 tons based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The organic compounds emitted during the first full calendar month after permit issuance shall be added to the organic compound emission total from the previous 11 months of operation to begin the rolling, 12-month summation.  
The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY as a rolling, 12-month summation for any single HAP and 25 TPY as a rolling, 12-month summation for any combination of HAPs. The HAPs emitted during the first full calendar month after permit issuance shall be added to the HAP emission totals from the previous 11 months of operation to begin the rolling, 12-month summation.  
All OC emissions from this emissions unit shall be vented directly (100% capture) to a thermal incinerator with a destruction efficiency of at least 96 percent by weight.

**B. Operational Restrictions**

1. The combined maximum annual production rate for emissions units P001-P005 shall not exceed 23,300 tons based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The production rate during the first calendar month after permit issuance shall be added to the total production rate from the previous 11 months of operation to begin the rolling, 12-month summation.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. For emission units P001-P005, the permittee shall collect and record the following information on a monthly basis:
    - a. the total amount of varnish produced, in tons per month;
    - b. the OC emission rate, in tons per month;
    - c. the total HAP emission rate, in tons per month;
    - d. the speciated (individual) HAP emission rate, in tons per month;
    - e. the rolling, 12-month summation of varnish production, in tons;
    - f. the rolling, 12-month summation of OC emissions, in tons;
    - g. the rolling, 12-month summation of total HAP emissions, in tons; and
    - h. the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by-line basis.

3. In addition to the emission information specified in C.2., the permittee shall collect and record the following information on a monthly basis for all emissions units at the facility:
  - a. the total HAP emission rate, in tons per month;
  - b. the speciated (individual) HAP emission rate, in tons per month;
  - c. the rolling, 12-month summation of total HAP emissions, in tons; and
  - d. the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by line basis.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedences of the emission limitations and/or production limitation listed in A.2. or B.1.
3. The permittee shall submit annual reports which specify the following information for the previous calendar year:
  - a. the total combined OC emissions from emissions units P001-P005;
  - b. the varnish production totals, in tons per year, for emissions units P001-P005;
  - c. the total HAP emission rate, in tons per year, from all emission units; and
  - d. the speciated (individual) HAP emission rate, in tons per year from all emission units.

These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within six-months of issuance of this permit, and within six months of expiration of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the required OC destruction efficiency of 96% by weight.
  - c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement of 96 % by weight:

40 CFR, Part 60 Appendix A, Methods 1-5 and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or another approved test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations and production limitation specified in sections A. and B. of this permit shall be demonstrated by information found in monitoring and/or record keeping section C and the stack testing requirements specified in section E.1.
3. The following equation shall be used to calculate the monthly organic compound emission rate for P001-P005:
 
$$\left[ \left( \text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times \left( 1 - \frac{\text{overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}}{2000} \right) \right) \right]$$

\* Emission factor taken from AP-42, Fifth edition, Table 6.4-1 Uncontrolled Emission Factors for Varnish Manufacturing.
4. The following equation shall be used to calculate the monthly total HAP emission rate from P001-P005:

$$\left[ \left( \text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times \left( 1 - \frac{\text{overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}}{2000} \right) \right) \times \text{the total} \right]$$

HAP content, as a percent by weight, of the varnish produced)/2000]

5. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate(s) for emission units P001-P005:

[(Tons of varnish produced during the month X 160 lbs of OC/ton of varnish produced\* X (1-the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance) X the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced)/2000]

6. The following equation shall be used to calculate the monthly total HAP emission rate for varnish manufacturing from emission units other than P001-P005:

[(Tons of varnish produced during the month X Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing) X the total HAP content, as a percent by weight, of the varnish produced)/2000]

7. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate for varnish manufacturing from emission units other than P001-P005:

[(Tons of varnish produced during the month X Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing) X the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced)/2000]

**F. Miscellaneous Requirements**

1. The terms and conditions in Sections A through F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1431483219 Emissions Unit ID: P004 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Varnish Kettle K-6 with thermal oxidizer	OAC 3745-35-07(B)(2) OAC 3745-21-07(G)(2)	See A.2. and B.1.-B.2. The emission limitations/control requirements specified in OAC 3745-21-07(G)(2) are less stringent than those established under 3745-35-07.

**2. Additional Terms and Conditions**

- (a) The combined annual emissions of organic compounds from emissions units P001-P005 shall not exceed 74.56 tons based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The organic compounds emitted during the first full calendar month after permit issuance shall be added to the organic compound emission total from the previous 11 months of operation to begin the rolling, 12-month summation. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY as a rolling, 12-month summation for any single HAP and 25 TPY as a rolling, 12-month summation for any combination of HAPs. The HAPs emitted during the first full calendar month after permit issuance shall be added to the HAP emission totals from the previous 11 months of operation to begin the rolling, 12-month summation. All OC emissions from this emissions unit shall be vented directly (100% capture) to a thermal incinerator with a destruction efficiency of at least 96 percent by weight.

**B. Operational Restrictions**

1. The combined maximum annual production rate for emissions units P001-P005 shall not exceed 23,300 tons based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The production rate during the first calendar month after permit issuance shall be added to the total production rate from the previous 11 months of operation to begin the rolling, 12-month summation.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. For emission units P001-P005, the permittee shall collect and record the following information on a monthly basis:
    - a. the total amount of varnish produced, in tons per month;
    - b. the OC emission rate, in tons per month;
    - c. the total HAP emission rate, in tons per month;
    - d. the speciated (individual) HAP emission rate, in tons per month;
    - e. the rolling, 12-month summation of varnish production, in tons;
    - f. the rolling, 12-month summation of OC emissions, in tons;
    - g. the rolling, 12-month summation of total HAP emissions, in tons; and
    - h. the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by line basis.

3. In addition to the emission information specified in C.2., the permittee shall collect and record the following information on a monthly basis for all emissions units at the facility:
  - a. the total HAP emission rate, in tons per month;
  - b. the speciated (individual) HAP emission rate, in tons per month;
  - c. the rolling, 12-month summation of total HAP emissions, in tons; and
  - d. the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by line basis.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedences of the emission limitations and/or production limitation listed in A.2. or B.1.
3. The permittee shall submit annual reports which specify the following information for the previous calendar year:
  - a. the total combined OC emissions from emissions units P001-P005;
  - b. the varnish production totals, in tons per year, for emissions units P001-P005;
  - c. the total HAP emission rate, in tons per year, from all emission units; and
  - d. the speciated (individual) HAP emission rate, in tons per year from all emission units.

These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within six-months of issuance of this permit, and within six months of expiration of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the required OC destruction efficiency of 96% by weight.
  - c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement of 96 % by weight:
 

40 CFR, Part 60 Appendix A, Methods 1-5 and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or another approved test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations and production limitation specified in sections A. and B. of this permit shall be demonstrated by information found in monitoring and/or record keeping section C and the stack testing requirements specified in section E.1.

3. The following equation shall be used to calculate the monthly organic compound emission rate for P001-P005:

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance})) / 2000]$$

\* Emission factor taken from AP-42, Fifth edition, Table 6.4-1 Uncontrolled Emission Factors for Varnish Manufacturing.

4. The following equation shall be used to calculate the monthly total HAP emission rate from P001-P005:

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}) \times \text{the total HAP content, as a percent by weight, of the varnish produced}) / 2000]$$

5. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate(s) for emission units P001-P005:

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}) \times \text{the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced}) / 2000]$$

6. The following equation shall be used to calculate the monthly total HAP emission rate for varnish manufacturing from emission units other than P001-P005:

$$[(\text{Tons of varnish produced during the month} \times \text{Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing)} \times \text{the total HAP content, as a percent by weight, of the varnish produced}) / 2000]$$

7. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate for varnish manufacturing from emission units other than P001-P005:

$$[(\text{Tons of varnish produced during the month} \times \text{Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing)} \times \text{the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced}) / 2000]$$

#### F. Miscellaneous Requirements

1. The terms and conditions in Sections A through F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1431483219 Emissions Unit ID: P005 Issuance type: Final State Permit To Operate

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#### Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

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

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Varnish Kettle K-3 with thermal oxidizer	OAC 3745-35-07(B)(2) OAC 3745-21-07(G)(2)	See A.2. and B.1.-B.2. The emission limitations/control requirements specified in OAC 3745-21-07(G)(2) are less stringent than those established under 3745-35-07.

**2. Additional Terms and Conditions**

- The combined annual emissions of organic compounds from emissions units P001-P005 shall not exceed 74.56 tons based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The organic compounds emitted during the first full calendar month after permit issuance shall be added to the organic compound emission total from the previous 11 months of operation to begin the rolling, 12-month summation.  
The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY as a rolling, 12-month summation for any single HAP and 25 TPY as a rolling, 12-month summation for any combination of HAPs. The HAPs emitted during the first full calendar month after permit issuance shall be added to the HAP emission totals from the previous 11 months of operation to begin the rolling, 12-month summation.  
All OC emissions from this emissions unit shall be vented directly (100% capture) to a thermal incinerator with a destruction efficiency of at least 96 percent by weight.

**B. Operational Restrictions**

- The combined maximum annual production rate for emissions units P001-P005 shall not exceed 23,300 tons based on a rolling, 12-month summation. This rolling summation shall begin upon issuance of this permit. The production rate during the first calendar month after permit issuance shall be added to the total production rate from the previous 11 months of operation to begin the rolling, 12-month summation.
- The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

- The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- For emission units P001-P005, the permittee shall collect and record the following information on a monthly basis:
    - the total amount of varnish produced, in tons per month;
    - the OC emission rate, in tons per month;
    - the total HAP emission rate, in tons per month;
    - the speciated (individual) HAP emission rate, in tons per month;
    - the rolling, 12-month summation of varnish production, in tons;
    - the rolling, 12-month summation of OC emissions, in tons;
    - the rolling, 12-month summation of total HAP emissions, in tons; and
    - the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by line basis.

- In addition to the emission information specified in C.2., the permittee shall collect and record the following information on a monthly basis for all emissions units at the facility:
  - the total HAP emission rate, in tons per month;
  - the speciated (individual) HAP emission rate, in tons per month;
  - the rolling, 12-month summation of total HAP emissions, in tons; and
  - the rolling, 12-month summation of speciated (individual) HAP emission rates, in tons.

This information does not have to be kept on a line-by line basis.

**D. Reporting Requirements**

- The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
- The permittee shall submit deviation (excursion) reports which identify any exceedences of the emission limitations and/or production limitation listed in A.2. or B.1.

3. The permittee shall submit annual reports which specify the following information for the previous calendar year:
  - a. the total combined OC emissions from emissions units P001-P005;
  - b. the varnish production totals, in tons per year, for emissions units P001-P005;
  - c. the total HAP emission rate, in tons per year, from all emission units; and
  - d. the speciated (individual) HAP emission rate, in tons per year from all emission units.

These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within six-months of issuance of this permit, and within six months of expiration of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the required OC destruction efficiency of 96% by weight.
  - c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement of 96 % by weight:

40 CFR, Part 60 Appendix A, Methods 1-5 and 25.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or another approved test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations and production limitation specified in sections A. and B. of this permit shall be demonstrated by information found in monitoring and/or record keeping section C and the stack testing requirements specified in section E.1.
3. The following equation shall be used to calculate the monthly organic compound emission rate for P001-P005:

$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance})) / 2000]$$

\* Emission factor taken from AP-42, Fifth edition, Table 6.4-1 Uncontrolled Emission Factors for Varnish Manufacturing.

4. The following equation shall be used to calculate the monthly total HAP emission rate from P001-P005:
 
$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}) \times \text{the total HAP content, as a percent by weight, of the varnish produced}) / 2000]$$
5. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate(s) for emission units P001-P005:
 
$$[(\text{Tons of varnish produced during the month} \times 160 \text{ lbs of OC/ton of varnish produced} \times (1 - \text{the overall control efficiency of the thermal oxidizer from the most recent stack test which demonstrated compliance}) \times \text{the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced}) / 2000]$$
6. The following equation shall be used to calculate the monthly total HAP emission rate for varnish manufacturing from emission units other than P001-P005:
 
$$[(\text{Tons of varnish produced during the month} \times \text{Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing)} \times \text{the total HAP content, as a percent by weight, of the varnish produced}) / 2000]$$
7. The following equation shall be used to calculate the monthly speciated (individual) HAP emission rate for varnish manufacturing from emission units other than P001-P005:

[(Tons of varnish produced during the month X Appropriate Emission Factor from AP-42 Section 6.4 (Paint and Varnish Manufacturing) X the speciated (individual) HAP content, for all HAPs, as a percent by weight, of the varnish produced)/2000]

**F. Miscellaneous Requirements**

1. The terms and conditions in Sections A through F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.