

Facility ID: 0125040238 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.

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Facility ID: 0125040238 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>
Resin reactor R-1 (2,500 gallon) w/condenser, wet scrubber and solid paraformaldehyde handling system connected to emergency containment.	OAC rule 3745-31-05(A)(3) PTI 01-08750	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr. Methanol emissions shall not exceed 0.55 lb/batch. Formaldehyde emissions shall not exceed 0.4 lb/batch. See sections A.2.b, B.1, and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05 (C)	OC emissions shall not exceed 5.8 tons/yr. Methanol emissions shall not exceed 0.4 ton during any rolling, 12-month period. Formaldehyde emissions shall not exceed 0.3 ton during any rolling, 12-month period.
		See A.2.a and B.3 below. See A.2.d below.
	OAC rule 3745-35-07(B)	

2. Additional Terms and Conditions

- (a) The facility-wide individual and combined hazardous air pollutant (HAP)¹ emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, by limiting the total HAP emissions from all emissions units. The permittee shall restrict total facility OC emissions to less than 99.9 tons per rolling, 12-month period.

1A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.
 The permittee developed the batch emission limitations based on calculation of maximum "worse case" emission rates to which a 95% control efficiency was applied to yield 0.55 lb methanol during a 9-hour batch cycle during alkoxy modified resins production. During alkoxy/aroxy resin production, the permittee shall vent OC emissions to the wet packed tower impingement scrubber that is designed and operated to reduce the VOC emissions vented to it with an efficiency of at least 95% by weight. Compliance with the hourly and annual emission limitations is assured as long as the permittee complies with the operational restrictions of this permit for parametric monitoring of exhaust gas

scrubber pressure drop and daily batch production rates.

The permittee shall, prior to production, ensure that this emissions unit is connected to the Emergency Containment System and that the Emergency Containment System is functional.

If any event causes a rupture disc to open, releasing material to the Emergency Containment System, all resin production shall be stabilized and no new batches will be started or restarted until any necessary repairs are made. The emergency containment system shall be drained and prepared for normal kettle operation prior to production restart.

The facility-wide potential to emit (PTE) for emission units at this facility, following issuance of this permit, will ensure that the HAP/VOC emissions will not exceed the Title V and MACT applicability thresholds of 10 tons individual HAP (Hazardous Air Pollutant), 25 tons total combined HAP emissions and 100 tons VOC per rolling, 12-month period. Therefore, the permittee, by complying with the federally enforceable terms and conditions for emission units, as listed in the table below, will not be subject to Title V permitting and provisions in either the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing 40 CFR Part 63 Subpart FFFF and Polymer & Resins III MACT under 40 CFR Part 63 Subpart OOO.

B. Operational Restrictions

1. The temperature of the exhaust gases from the condenser shall exceed 77 degrees Fahrenheit during any period of resin production.
2. The permittee shall maintain the following at all times during alkoxy/arloxy resin production:
 - a. the pH of the scrubber liquor between 7 and 9;
 - b. the pressure drop across the scrubber between 1 and 4 inches of water; and
 - c. the scrubber water flow rate at a value of not less than 120 gallons per minute per cubic feet of gas flow.
3. The permittee shall not complete more than 2 batches of alkoxy/arloxy resins, 4 batches of phenolic resins or 8 batches of melamine-formaldehyde in reactor R-1 during any daily period.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the identification and date of completion for each batch produced;
 - b. the numbers of each batch produced;
 - c. the total methanol, formaldehyde and OC emissions; and
 - d. the rolling, 12-month summation of methanol, formaldehyde and OC emissions.
2. The permittee shall collect and record the following information for each month for the emission units listed in section A.2e above :
 - a. the individual HAP1 emissions for each emissions unit at this facility, in pounds or tons;
 - b. the total combined HAP emissions for each emissions unit at this facility, in pounds or tons;
 - c. the individual HAP emissions for all emissions units at this facility, in pounds or tons;
 - d. the total combined HAP emissions for all emissions units at this facility, in pounds or tons;
 - e. the rolling 12-month summation of individual HAP emissions for all emissions units at the facility, in tons (i.e., the value from the current month added to the summation of the individual HAP emissions from the previous 11 months);
 - f. the rolling, 12-month summation of the total combined HAP emissions for all emissions units at the facility, in tons (i.e., the value from the current month added to the summation of the total combined HAP emissions from the previous 11 months);
 - g. the OC emission for each emissions unit at the facility, in pounds or tons; and
 - h. the rolling 12-month summation of the OC emissions for all emissions units at the facility, in tons (i.e., the value from the current month added to the summation of the OC emissions from the previous 11 months).
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

 - a. the temperature of the exhaust gases from the condenser during each period of time; and
 - b. a log or record of downtime for the control device and monitoring equipment, when the associated emissions unit is in operation.
4. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pH of the scrubber liquor during production of alkoxy/arloxy modified products. The pH monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information during production of alkoxy/arloxy modified products:

- a. the pH of the scrubber liquor;
- b. the pressure drop across the scrubber;
- c. the scrubber water flow rate in gallons per minute per cubic feet of gas flow; and
- d. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. In accordance with paragraph A. 2. b. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports of the following:
 - a. an identification of all periods of time, during which the temperature of the exhaust gases from the condenser exceeded the temperature limitation specified in section B.1, above;
 - b. an identification of all periods of time during alkoxy/arloxy resin production in which any of the following restrictions in B.2 were out of range:
 - i. the pH of the scrubber liquor was less than 7 or greater than 9;
 - ii. the pressure drop across the scrubber was less than 1 or greater than 4 inches of water at all times; and
 - iii. the scrubber water flow rate was less than 120 gallons per minute per cubic feet of gas flow;
 - c. identify any exceedances of the daily batch production rates specified in B.3, above;
 - d. an identification of all exceedances of the rolling, 12-month formaldehyde and methanol emission limitations;
 - e. an identification of all exceedances of the rolling 12-month individual and combined HAP emission limitations; and
 - f. an identification of all exceedances of the rolling, 12-month OC emission limitation.

the deviation (excursion) reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.
2. The permittee shall submit an annual report to the Ohio EPA, CDO that identify the total OC emissions emitted from this emissions unit for the previous calendar year. These annual reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitation of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:
Methanol emissions shall not exceed 0.55 lb/batch.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing to demonstrate compliance with the batch emission rate during alkoxy/arloxy resin production.

 - i. the emission testing shall be conducted within 6 months of initiating alkoxy/arloxy resin production.
 - ii. the emission testing shall be conducted to demonstrate compliance with batch emission rate for methanol.
 - iii. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40CFR Part60 Appendix A Method 308 for methanol emission - if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA CDO.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA CDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA CDO, refusal to accept the results of the emission test.

Personnel from the Ohio EPA CDO shall be permitted to witness the test, 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 shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, CDO within 30 days following completion of the test. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, CDO.

Emission Limitation:

Methanol emissions shall not exceed 0.4 ton per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established by using an emission factor of 0.27 lbs methanol/batch melamine resin multiplied by 240 batches per month multiplied by 12 months per year divided by 2,000 lbs/ton. Compliance with this emission limitation shall be demonstrated based upon the record keeping requirements of this permit.

Emission Limitation:

Formaldehyde emissions shall not exceed 0.4 lb/batch.

Applicable Compliance Method:

This emission limitation was established by emission testing during phenolic resin production on November 20, 1997 and during melamine resin production on March 12, 2003. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 308.

Emission Limitation:

Formaldehyde emissions shall not exceed 0.3 ton per rolling, 12- month period.

Applicable Compliance Method:

This emissions limitation was established by using an emission factor of 0.4 lb formaldehyde /batch phenol-formaldehyde resin multiplied by 124 batches per month multiplied by 12 months divided by 2,000 lbs/ton. Compliance is ensured, if the permittee demonstrates compliance with the operational restrictions, monitoring and record keeping requirements of this permit.

Emissions Limitation:

OC emissions shall not exceed 8.0 lbs/hr.

Applicable Compliance Method:

The permittee shall demonstrate compliance based on emission testing requirements in section E.1.a above.

Emission Limitation:

OC emissions shall not exceed 5.8 tons OC per year;

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.1 of this permit.

The individual and combined HAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, from all emissions units listed in section A.2e above .

Applicable Compliance Method:

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

Emission Limitation:

The total OC emissions shall not exceed 99.9 tons per rolling, 12- month period from all emissions units listed in section A.2e above .

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.1 of this permit and the other appropriate sections in those permits as identified in section A.2e above for all the emission units at the facility.

F. Miscellaneous Requirements

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

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Facility ID: 0125040238 Emissions Unit ID: P016 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>
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Resin reactor R-2 (2,500 gallon) w/condenser, wet scrubber and solid paraformaldehyde handling system connected to emergency containment.	OAC rule 3745-31-05(A)(3) PTI 01-08750	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr. Methanol emissions shall not exceed 0.55 lb/batch. Formaldehyde emissions shall not exceed 0.4 lb/batch. See sections A.2.b, B.1, and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	OC emissions shall not exceed 5.8 tons/yr. Methanol emissions shall not exceed 0.4 ton during any rolling, 12-month period. Formaldehyde emissions shall not exceed 0.3 ton during any rolling, 12-month period. See A.2.a and B.3 below.
	OAC rule 3745-35-07(B)	See A.2.d below.

2. Additional Terms and Conditions

- (a) The facility-wide individual and combined hazardous air pollutant (HAP)1 emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, by limiting the total HAP emissions from all emissions units. The permittee shall restrict total facility OC emissions to less than 99.9 tons per rolling, 12-month period.

1A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

The permittee developed the batch emission limitations based on calculation of maximum "worse case" emission rates to which a 95% control efficiency was applied to yield 0.55 lb methanol during a 9-hour batch cycle during alkoxy modified resins production. During alkoxy/arloxy resin production, the permittee shall vent OC emissions to the wet packed tower impingement scrubber that is designed and operated to reduce the VOC emissions vented to it with an efficiency of at least 95% by weight. Compliance with the hourly and annual emission limitations is assured as long as the permittee complies with the operational restrictions of this permit for parametric monitoring of exhaust gas scrubber pressure drop and daily batch production rates.

The permittee shall, prior to production, ensure that this emissions unit is connected to the Emergency Containment System and that the Emergency Containment System is functional.

If any event causes a rupture disc to open, releasing material to the Emergency Containment System, all resin production shall be stabilized and no new batches will be started or restarted until any necessary repairs are made. The emergency containment system shall be drained and prepared for normal kettle operation prior to production restart.

The facility-wide potential to emit (PTE) for emission units at this facility, following issuance of this permit, will ensure that the HAP/VOC emissions will not exceed the Title V and MACT applicability thresholds of 10 tons individual HAP (Hazardous Air Pollutant), 25 tons total combined HAP emissions and 100 tons VOC per rolling, 12-month period.. Therefore, the permittee, by complying with the federally enforceable terms and conditions for emission units, as listed in the table below, will not be subject to Title V permitting and provisions in either the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing 40 CFR Part 63 Subpart FFFF and Polymer & Resins III MACT under 40 CFR Part 63 Subpart OOO.

B. Operational Restrictions

1. The temperature of the exhaust gases from the condenser shall exceed 77 degrees Fahrenheit during any period of resin production.
2. The permittee shall maintain the following at all times during alkoxy/arloxy resin production:
 - a. the pH of the scrubber liquor between 7 and 9;
 - b. the pressure drop across the scrubber between 1 and 4 inches of water; and
 - c. the scrubber water flow rate at a value of not less than 120 gallons per minute per cubic feet of gas flow.
3. The permittee shall not complete more than 2 batches of alkoxy/arloxy resins, 4 batches of phenolic resins or 8 batches of melamine-formaldehyde in reactor R-1 during any daily period.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the identification and date of completion for each batch produced;
 - b. the numbers of each batch produced;

- c. the total methanol, formaldehyde and OC emissions; and
 - d. the rolling, 12-month summation of methanol, formaldehyde and OC emissions.
2. The permittee shall collect and record the following information for each month for the emission units listed in section A.2e above :
- a. the individual HAP1 emissions for each emissions unit at this facility, in pounds or tons;
 - b. the total combined HAP emissions for each emissions unit at this facility, in pounds or tons;
 - c. the individual HAP emissions for all emissions units at this facility, in pounds or tons;
 - d. the total combined HAP emissions for all emissions units at this facility, in pounds or tons;
 - e. the rolling 12-month summation of individual HAP emissions for all emissions units at the facility, in tons (i.e., the value from the current month added to the summation of the individual HAP emissions from the previous 11 months);
 - f. the rolling, 12-month summation of the total combined HAP emissions for all emissions units at the facility, in tons (i.e., the value from the current month added to the summation of the total combined HAP emissions from the previous 11 months);
 - g. the OC emission for each emissions unit at the facility, in pounds or tons; and
 - h. the rolling 12-month summation of the OC emissions for all emissions units at the facility, in tons (i.e., the value from the current month added to the summation of the OC emissions from the previous 11 months).
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the temperature of the exhaust gases from the condenser during each period of time; and
 - b. a log or record of downtime for the control device and monitoring equipment, when the associated emissions unit is in operation.
4. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pH of the scrubber liquor during production of alkoxy/arloxy modified products. The pH monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- The permittee shall collect and record the following information during production of alkoxy/arloxy modified products:
- a. the pH of the scrubber liquor;
 - b. the pressure drop across the scrubber;
 - c. the scrubber water flow rate in gallons per minute per cubic feet of gas flow; and
 - d. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. In accordance with paragraph A. 2. b. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports of the following:
- a. an identification of all periods of time, during which the temperature of the exhaust gases from the condenser exceeded the temperature limitation specified in section B.1, above;
 - b. an identification of all periods of time during alkoxy/arloxy resin production in which any of the following restrictions in B.2 were out of range:
 - i. the pH of the scrubber liquor was less than 7 or greater than 9;
 - ii. the pressure drop across the scrubber was less than 1 or greater than 4 inches of water at all times; and
 - iii. the scrubber water flow rate was less than 120 gallons per minute per cubic feet of gas flow;
 - c. identify any exceedances of the daily batch production rates specified in B.3, above;
 - d. an identification of all exceedances of the rolling, 12-month formaldehyde and methanol emission limitations;
 - e. an identification of all exceedances of the rolling 12-month individual and combined HAP emission limitations; and
 - f. an identification of all exceedances of the rolling, 12-month OC emission limitation.

the deviation (excursion) reports shall be submitted in accordance with the requirements specified in General

Term and Condition A.2 of this permit.

2. The permittee shall submit an annual report to the Ohio EPA, CDO that identify the total OC emissions emitted from this emissions unit for the previous calendar year. These annual reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitation of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
Methanol emissions shall not exceed 0.55 lb/batch.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing to demonstrate compliance with the batch emission rate during alkoxy/arloxy resin production.
 - i. the emission testing shall be conducted within 6 months of initiating alkoxy/arloxy resin production.
 - ii. the emission testing shall be conducted to demonstrate compliance with batch emission rate for methanol.
 - iii. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40CFR Part60 Appendix A Method 308 for methanol emission - if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA CDO.

Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA CDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA CDO, refusal to accept the results of the emission test.

Personnel from the Ohio EPA CDO shall be permitted to witness the test, 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 shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, CDO within 30 days following completion of the test. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, CDO.

Emission Limitation:

Methanol emissions shall not exceed 0.4 ton per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established by using an emission factor of 0.27 lbs methanol/batch melamine resin multiplied by 240 batches per month multiplied by 12 months per year divided by 2,000 lbs/ton. Compliance with this emission limitation shall be demonstrated based upon the record keeping requirements of this permit.

Emission Limitation:

Formaldehyde emissions shall not exceed 0.4 lb/batch.

Applicable Compliance Method:

This emission limitation was established by emission testing during phenolic resin production on November 20, 1997 and during melamine resin production on March 12, 2003. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 308.

Emission Limitation:

Formaldehyde emissions shall not exceed 0.3 ton per rolling, 12- month period.

Applicable Compliance Method:

This emissions limitation was established by using an emission factor of 0.4 lb formaldehyde /batch phenol-formaldehyde resin multiplied by 124 batches per month multiplied by 12 months divided by 2,000 lbs/ton. Compliance is ensured, if the permittee demonstrates compliance with the operational restrictions, monitoring and record keeping requirements of this permit.

Emissions Limitation:

OC emissions shall not exceed 8.0 lbs/hr.

Applicable Compliance Method:

The permittee shall demonstrate compliance based on emission testing requirements in section E.1.a above.

Emission Limitation:

OC emissions shall not exceed 5.8 tons OC per year;

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.1 of this permit.

The individual and combined HAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively, from all emissions units listed in section A.2e above .

Applicable Compliance Method:

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

Emission Limitation:

The total OC emissions shall not exceed 99.9 tons per rolling, 12- month period from all emissions units listed in section A.2e above .

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.1 of this permit and the other appropriate sections in those permits as identified in section A.2e above for all the emission units at the facility.

F. Miscellaneous Requirements

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