

Facility ID: 0125040904 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 J001](#)
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Facility ID: 0125040904 Emissions Unit ID: J001 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>
tanker loading station 2 for phenol-formaldehyde resins with submerged fill	OAC rule 3745-35-07(B)(2) (Synthetic Minor to avoid Title V (TV) and Maximum Achievable Control Technology requirements (MACT))	Methanol emissions from loading stations 2 (J001) and 3 (J002) shall not exceed 0.071 ton/yr. Formaldehyde emissions from loading stations 2 (J001) and 3 (J002) shall not exceed 0.022 ton/yr.
	OAC rule 3745-21-07(E)(2)	See sections A.2.a A.2.b and B.1 below. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07(B)(2).

2. **Additional Terms and Conditions**
 - (a) The annual emission limitations were established to reflect the potentials to emit (PTEs) for emissions units J001 and J002. The PTEs are based upon a maximum annual production capacity of resin kettles 1 (P004) and 3 (P006) of 11,523,108 gallons phenol-formaldehyde resins, 1,125,482 gallons of which may contain residual methanol.
The restrictions to potential to emit (PTE) for the above listed emission unit at this facility will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC) emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable terms and conditions specified in section II.A.1, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart HHHHH.

A 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.

B. Operational Restrictions

1. The permittee shall not load novalac resin through this loading station.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain a record of the company identification and the gallons (or weight in pounds) of each

resin loaded during each fiscal quarter.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Ohio EPA, that specify the total methanol and formaldehyde emissions from loading stations 2 (J001) and 3 (J002) for the previous calendar year (January 1 through December 31). The report 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 limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
Methanol emissions from loading stations 2 (J001) and 3 (J002) shall not exceed 0.071 ton/yr.

Applicable Compliance Method:

Compliance with the annual allowable methanol emission limitation may be demonstrated by recordkeeping of the phenol-formaldehyde resin with residual methanol production in pounds multiplied by the conversion of 1 gallon/9.34 lbs (1,125,482 gallons) multiplied by the G-P Resins derived emission factor of 0.12548 lb methanol/1,000 gallon resin multiplied by 1 ton/2,000 lbs.

The emission factor of 0.12548 lb methanol/1,000 gallon resin was derived using equations in AP-42 section 4.4 based on the partial vapor pressure of 0.3336 psi at 70 degrees Fahrenheit (average storage temperature).

Emission Limitation:

Formaldehyde emissions from loading stations 2 (J001) and 3 (J002) shall not exceed 0.022 ton/yr.

Applicable Compliance Method:

Compliance with the annual allowable formaldehyde emission limitation may be demonstrated by recordkeeping of the phenol-formaldehyde resin production in pounds multiplied by the conversion of 1 gallon/9.34 lbs resin (11,523,108 gallons - 1,125,482 gallons) multiplied by G-P Resins derived emission factor of 0.00405 lb formaldehyde/1,000 gallon phenol-formaldehyde resin with no residual methanol plus (1,125,482 gallons) multiplied times the G-P Resins derived emission factor of 0.00102 lb formaldehyde/1,000 gallon phenolic resin with residual methanol multiplied by 1 ton/2,000 lbs.

The emission factor of 0.00405 lb formaldehyde/1,000 gallon resin was derived using equations in AP-42 section 4.4 based on the partial vapor pressure of 0.0117 psi at 80 degrees Fahrenheit (average storage temperature).

The emission factor of 0.00102 lb formaldehyde/1,000 gallon phenolic resin with residual methanol was derived using equations in AP-42 section 4.4 based on the partial vapor pressure of 0.00295 psi at 70 degrees Fahrenheit (average storage temperature).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A-F.

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Facility ID: 0125040904 Emissions Unit ID: J002 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>
tanker loading station 3 for phenol-formaldehyde resins with submerged fill	OAC rule 3745-35-07(B)(2) (Synthetic Minor to avoid Title V (TV) and Maximum Achievable Control Technology requirements	Methanol emissions from loading station 2 (J001) and 3 (J002) shall not exceed 0.071 ton/yr. Formaldehyde emissions from loading station 2 (J001)

(MACT))

and 3 (J002) shall not exceed 0.022 ton/yr.

OAC rule 3745-21-07(E)(2)

See sections A.2.a, A.2.b and B.1 below.

The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07(B)(2).

2. Additional Terms and Conditions

- (a) The annual emission limitations were established to reflect the potentials to emit (PTEs) for emissions units J001 and J002. The PTEs are based upon a maximum annual production capacity of resin kettles 1 (P004) and 3 (P006) of 11,523,108 gallons phenol-formaldehyde resins, 1,125,482 gallons of which may contain residual methanol.
The restrictions to potential to emit (PTE) for the above listed emission unit at this facility will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC) emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable terms and conditions specified in section II.A.1, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart HHHHH.

A 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.

B. Operational Restrictions

1. The permittee shall not load novalac resin through this loading station.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain a record of the company identification and the gallons (or weight in pounds) of each resin loaded during each fiscal quarter.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Ohio EPA, that specify the total methanol and formaldehyde emissions from loading stations 2 (J001) and 3 (J002) for the previous calendar year (January 1 through December 31). The report 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 limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
Methanol emissions from loading stations 2 (J001) and 3 (J002) shall not exceed 0.071 ton/yr.

Applicable Compliance Method:

Compliance with the annual allowable methanol emission limitation may be demonstrated by recordkeeping of the phenol-formaldehyde resin with residual methanol production in pounds multiplied by the conversion of 1 gallon/9.34 lbs (1,125,482 gallons) multiplied by the G-P Resins derived emission factor of 0.12548 lb methanol/1,000 gallon resin multiplied by 1 ton/2,000 lbs.

The emission factor of 0.12548 lb methanol/1,000 gallon resin was derived using equations in AP-42 section 4.4 based on the partial vapor pressure of 0.3336 psi at 70 degrees Fahrenheit (average storage temperature).

Emission Limitation:

Formaldehyde emissions from loading stations 2 (J001) and 3 (J002) shall not exceed 0.022 ton/yr.

Applicable Compliance Method:

Compliance with the annual allowable formaldehyde emission limitation may be demonstrated by recordkeeping of the phenol-formaldehyde resin production in pounds multiplied by the conversion of 1 gallon/9.34 lbs resin (11,523,108 gallons - 1,125,482 gallons) multiplied by G-P Resins derived emission factor of 0.00405 lb formaldehyde/1,000 gallon phenol-formaldehyde resin with no residual methanol plus (1,125,482 gallons) multiplied times the G-P Resins derived emission factor of 0.00102 lb formaldehyde/1,000 gallon phenolic resin with residual methanol multiplied by 1 ton/2,000 lbs.

The emission factor of 0.00405 lb formaldehyde/1,000 gallon resin was derived using equations in AP-42 section 4.4 based on the partial vapor pressure of 0.0117 psi at 80 degrees Fahrenheit (average storage temperature).

The emission factor of 0.00102 lb formaldehyde/1,000 gallon phenolic resin with residual methanol was derived using equations in AP-42 section 4.4 based on the partial vapor pressure of 0.00295 psi at 70 degrees Fahrenheit (average storage temperature).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A-F.

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Facility ID: 0125040904 Emissions Unit ID: J003 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>
tanker loading station 4 for phenol-formaldehyde resins with venting to the resin plant thermal oxidizer	OAC rule 3745-35-07(B)(2) (Synthetic Minor to avoid Title V (TV) and Maximum Achievable Control Technology requirements (MACT))	Methanol emissions from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr. Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.191 lb/hr and 0.835 ton/yr. Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.
	OAC rule 3745-21-07(E)(2)	See sections A.2.a - d and B.1 - 3 below. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07(B)(2).

2. Additional Terms and Conditions

- (a) All of the OC emissions from the following emissions units shall be vented to the resin plant thermal oxidizer: methanol storage tank T065, resin kettle K-1 P004; resin kettle K-3 P006; 24 resin storage tanks T013-T016, T019-T021, T024, T025, T027, T028, T031 -T036, T057 - T062, Z011; 9 formaldehyde T039 - T041, T051- T056 and 8 urea-formaldehyde solution storage tanks T042-T046, T048, and T049; 1 phenol formaldehyde load station J003 and 1 urea-formaldehyde/formaldehyde load station J004.

The restrictions to potential to emit (PTE) for the above listed emission units at this facility will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC) emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable terms and conditions specified in section II.A.1, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart HHHHH.

A 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 loading rack shall be equipped with a vapor collection system whereby during the transfer of novalac resin product to any delivery vessel, all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system.

The vapor collection system shall vent to the resin plant thermal oxidizer; and the thermal oxidizer shall achieve and maintain either a minimum 98% destruction efficiency, by weight, or an outlet concentration of less than 20 parts per million (ppm), by volume, dry basis.

All resin product loading lines and vapor lines shall be equipped with fittings that are vapor tight.

B. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when this emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (or equivalent 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated that this emissions unit was in compliance.

2. During loading of novalac resin, the resin solution loading lines and vapor lines shall be equipped with fittings which are vapor tight. The vapor collection system shall vent to the resin plant thermal oxidizer and maintain a minimum 100% capture efficiency.
3. A means shall be provided to prevent drainage of phenol-formaldehyde product from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

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 (or equivalent degrees Celsius). 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 oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (or equivalent 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated compliance; and

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

D. Reporting Requirements

1. In accordance with paragraph A.1 of the General Terms and Conditions, 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 in section B.1, above, and the number of hours of downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The facility shall submit annual reports to the Ohio EPA, which at a minimum specify the total methanol and formaldehyde from loading station 4 (J003), for the previous calendar year (January 1 through December 31). The 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 limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations:

The vapor collection system shall vent to the resin plant thermal oxidizer; and the thermal oxidizer shall achieve and maintain either a minimum 98% destruction efficiency, by weight, or an outlet concentration of less than 20 parts per million (ppm), by volume, dry basis.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. the emission testing shall be conducted approximately 6 months and 2.5 years after permit issuance and within 6 months prior to permit expiration;

ii. the emission testing shall be conducted to demonstrate compliance with the control efficiency across the thermal oxidizer and/or the outlet concentration equivalent to the hourly allowable for methanol and formaldehyde. 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 3745-21-10(C)(2)(b). 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;

iii. the following test method shall be employed to demonstrate compliance: Methods 1-4 and 320 of 40 CFR Part 60, Appendix A for formaldehyde, methanol and phenol concentrations at the inlet and outlet to determine VOC control efficiency. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and

iv. the test 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 person 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 from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation through the emission testing required in section E.1.a.

The annual emission limitation is based on the potential to emit and compliance with the annual limitation shall be ensured if the permittee demonstrates compliance with the hourly emission limitation.

Emission Limitation:

Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.191 lb/hr and 0.835 ton/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation through the emission testing required in section E.1.a.

The annual emission limitation is based on the potential to emit and compliance with the annual limitation shall be ensured if the permittee demonstrates compliance with the hourly emission limitation.

Emission Limitation:

Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for carbon monoxide may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

F. **Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A-F.

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Facility ID: 0125040904 Emissions Unit ID: J004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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>
tanker loading station 1 for formaldehyde and urea-formaldehyde solution with venting to the resin plant thermal oxidizer	OAC rule 3745-35-07(B)(2) (Synthetic Minor to avoid Title V (TV) and Maximum Achievable Control Technology requirements (MACT))	Methanol emissions from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr. Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.191 lb/hr and 0.835 ton/yr. Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.
	OAC rule 3745-21-07(E)(2)	See sections A.2.a - d and B.1 - 4, below. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07(B)(2).
rail loading station 5 for urea-formaldehyde solution	OAC rule 3745-35-07(B)(2)	Methanol emissions from loading urea-formaldehyde solution through rail loading station 5 (J004) shall not exceed 0.014 ton/yr.

Formaldehyde emissions from loading urea-formaldehyde solution through rail loading station 5 (J004) shall not exceed 0.049 ton/yr.

See section A.2.d.

2. Additional Terms and Conditions

- (a) All of the OC emissions from the following emissions units shall be vented to the resin plant thermal oxidizer: methanol storage tank T065, resin kettle K-1 P004; resin kettle K-3 P006; 24 resin storage tanks T013-T016, T019-T021, T024, T025, T027, T028, T031 -T036, T057 - T062, Z011; 9 formaldehyde T039 - T041, T051- T056 and 8 urea-formaldehyde solution storage tanks T042-T046, T048, and T049; 1 phenol formaldehyde load station J003 and 1 urea-formaldehyde/formaldehyde load station J004.

The restrictions to potential to emit (PTE) for the above listed emission units at this facility will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC) emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable terms and conditions specified in section II.A.1, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart HHHHH.

A 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.

Loading station 1 for formaldehyde solution shall be equipped with a vapor collection system whereby during the transfer of formaldehyde and urea-formaldehyde product to any delivery vessel, all vapors displaced from the delivery vessel during loading are vented only to the resin plant thermal oxidizer.

The annual emission limitation from loading station 5 was established to reflect the potential to emit (PTE) for formaldehyde and methanol emissions from the maximum design capacity of formaldehyde plant number 1.

The PTE for the rail loading station is based upon the maximum design capacity of 105,014,880 lbs (9,512,217gallons) 30% urea-formaldehyde solution from formaldehyde plant 1.

The emission factor for formaldehyde during transfer of 30% urea-formaldehyde solution of 0.01027 lb/1,000 gallon for uncontrolled emissions from the tanker loading station was derived using equations in AP-42 section 4.4 based on the partial vapor pressure of 0.0300 psi at 86 degrees Fahrenheit (average storage temperature).

The emission factor for methanol during transfer of 30% urea-formaldehyde solution of 0.003 lb/1,000 gallon for uncontrolled emissions from the tanker loading station was derived using equations in AP-42 section 4.4 based on the partial pressure of 0.0082 psi at 86 degrees Fahrenheit (average storage temperature).

B. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when this emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (or equivalent 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated that this emissions unit was in compliance.
2. A means shall be provided to prevent drainage of formaldehyde product from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected. The permittee shall not permit formaldehyde to be spilled or handled in any other manner that would result in evaporation.
3. All formaldehyde and urea-formaldehyde solution lines and vapor lines for loading station 1 shall be equipped with fittings which are vapor tight.
4. All formaldehyde solution shall be loaded through station 1 with a vapor collection system to maintain 100% capture efficiency with venting to the resin plant thermal oxidizer.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain a record of the company identification and the gallons (or weight in pounds) of urea-formaldehyde solution (as 50% formaldehyde) loaded through rail loading station 5 during each fiscal quarter.
2. 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 (or in equivalent degrees Celsius). 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 oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (or equivalent 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated compliance; and

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

D. Reporting Requirements

1. In accordance with paragraph A.1 of the General Terms and Conditions, 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 in section B.1, above, and the number of hours of downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The facility shall submit annual reports to the Ohio EPA, which at a minimum specify the total methanol and formaldehyde emissions from tanker loading station 1 (J004) and rail loading station 5, for the previous calendar year (January 1 through December 31). The 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 section A.I. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations:

The vapor collection system shall vent to the resin plant thermal oxidizer; and the thermal oxidizer shall achieve and maintain either a minimum 98% destruction efficiency, by weight, or an outlet concentration of less than 20 parts per million (ppm), by volume, dry basis.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. the emission testing shall be conducted approximately 6 months and 2.5 years after permit issuance and within 6 months prior to permit expiration;
- ii. the emission testing shall be conducted to demonstrate compliance with the control efficiency across the thermal oxidizer and/or the outlet concentration equivalent to the hourly allowable for methanol, formaldehyde and phenol. 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 3745-21-10(C)(2)(b). 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; and

iii. the following test method shall be employed to demonstrate compliance: Methods 1-4 and 320 of 40 CFR Part 60, Appendix A for formaldehyde and methanol concentrations at the inlet and outlet to determine VOC control efficiency. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and

iv. the test 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 person 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 from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation through the emission testing required in section E.1.a.

The annual emission limitation is based on the potential to emit and compliance with the annual limitation shall be ensured if the permittee demonstrates compliance with the hourly emission limitation.

Emission Limitation:

Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.191 lb/hr and 0.835 ton/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation through the emission testing required in section E.1.a.

The annual emission limitation is based on the potential to emit and compliance with the annual limitation shall be ensured if the permittee demonstrates compliance with the hourly emission limitation.

Emission Limitation:

Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for carbon monoxide may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and

compliance demonstration with hourly emission limitation required above.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A-F.

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

Facility ID: 0125040904 Emissions Unit ID: T015 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>
phenolic resins storage tank (25,000 gallons) with venting to the resin plant thermal oxidizer	OAC rule 3745-35-07(B)(2) (Synthetic Minor to avoid Title V (TV) and Maximum Achievable Control Technology requirements (MACT))	Methanol emissions from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr. Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.191 lb/hr and 0.835 ton/yr. Phenol emissions from the resin plant thermal oxidizer stack shall not exceed 0.107 lb/hr and 0.467 ton/yr. Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.
	OAC rule 3745-21-07(D)	See sections A.2.a, A.2.b and B.1 below. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07(B)(2).

2. Additional Terms and Conditions

- (a) All of the OC emissions from the following emissions units shall be vented to the resin plant thermal oxidizer: methanol storage tank T065, resin kettle K-1 P004; resin kettle K-3 P006; 24 resin storage tanks T013-T016, T019-T021, T024, T025, T027, T028, T031 -T036, T057 - T062, Z011; 9 formaldehyde T039 - T041, T051- T056 and 8 urea-formaldehyde solution storage tanks T042-T046, T048, and T049; 1 phenol formaldehyde load station J003 and 1 urea-formaldehyde/formaldehyde load station J004.

The restrictions to potential to emit (PTE) for the above listed emission units at this facility will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC) emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable terms and conditions specified in section II.A.1, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart HHHHH.

A 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 annual emission limitation was established to reflect the potentials to emit (PTEs) of the 24 phenol-

formaldehyde resin storage tanks venting to the resin plant thermal oxidizer. The PTEs are based upon a maximum annual production rate of 210,240,000 lbs of phenolic resins from both resin kettles, and the 98% destruction efficiency requirement for the emissions from the resin plant thermal oxidizer.

The following resin storage tanks are identical to T015 and have been placed on permit to operate registration status: T013-T016, T019-T021, T024, T025, T027, T028, T031 -T036, T057 - T062, Z011. Although these storage tanks have been placed on registration status, they are subject to the control requirements specified in A.1, A.2.a and A.2.b.

B. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when this emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (or equivalent to 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated that this 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 (or in equivalent degrees Celsius). 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 oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (or equivalent 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated compliance; and

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

D. Reporting Requirements

1. In accordance with paragraph A.1 of the General Terms and Conditions, 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 in section B.1, above, and the number of hours of downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The facility shall submit annual reports to the Ohio EPA, which at a minimum specify the total methanol, formaldehyde and phenol from the 25,000 gallon resin storage tanks as emissions from resin plant thermal oxidizer, for the previous calendar year (January 1 through December 31). The 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 limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitations:

The vapor collection system shall vent to the resin plant thermal oxidizer; and the thermal oxidizer shall achieve and maintain either a minimum 98% destruction efficiency, by weight, or an outlet concentration of less than 20 parts per million (ppm), by volume, dry basis.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. the emission testing shall be conducted approximately 6 months and 2.5 years after permit issuance and within 6 months prior to permit expiration;

ii. the emission testing shall be conducted to demonstrate compliance at the outlet concentration equivalent to the hourly allowable for methanol, formaldehyde and phenol and/or the control efficiency across the thermal oxidizer. 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 3745-21-10(C)(2)(b). 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;

iii. the following test method shall be employed to demonstrate compliance: Methods 1-4 and 320 of 40 CFR Part 60, Appendix A for formaldehyde, methanol and phenol concentrations at the inlet and outlet to determine VOC control efficiency. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and

iv. the test 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 person 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 from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for methanol may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

Emission Limitation:

Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.1918 lb/hr and 0.835 ton/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for formaldehyde may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

Emission Limitation:

Phenol emissions from the resin plant thermal oxidizer stack shall not exceed 0.127 lb/hr and 0.556 ton/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for phenol may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

Emission Limitation:

Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for carbon monoxide may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A-F.

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

Facility ID: 0125040904 Emissions Unit ID: T039 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>
formaldehyde solution storage tanks T039 (25,000 gallons) vented to resin plant thermal oxidizer	OAC rule 3745-35-07(B)(2) (Synthetic Minor to avoid Title V (TV) and Maximum Achievable Control Technology requirements	Methanol emissions from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr.

(MACT))

Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.191 lb/hr and 0.835 ton/yr.

Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.

See sections A.2.a, A.2.b and B.1 below.

OAC rule 3745-21-07(D)

The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07 (B)(2).

OAC rule 3745-31-05(A)(3)
(PTI 01-01914)

The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07 (B)(2).

2. Additional Terms and Conditions

- (a) All of the OC emissions from the following emissions units shall be vented to the resin plant thermal oxidizer: methanol storage tank T065, resin kettle K-1 P004; resin kettle K-3 P006; 24 resin storage tanks T013-T016, T019-T021, T024, T025, T027, T028, T031 -T036, T057 - T062, Z011; 9 formaldehyde T039 - T041, T051- T056 and 8 urea-formaldehyde solution storage tanks T042-T046, T048, and T049; 1 phenol formaldehyde load station J003 and 1 urea-formaldehyde/formaldehyde load station J004.

The restrictions to potential to emit (PTE) for the above listed emission units at this facility will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC) emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable terms and conditions specified in section II.A.1, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart HHHHH.

A 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 following formaldehyde storage tanks are identical to T039 and have been placed on permit to operate registration status:T040-41 and T051-56. Although these storage tanks have been placed on registration status, they are subject to the control requirements specified in A.1 and A.2.a.

B. Operational Restrictions

- 1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when this emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (or equivalent 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated that this 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 (or in equivalent degrees Celsius). 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 oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (or equivalent 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated compliance; and

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

D. Reporting Requirements

- 1. In accordance with paragraph A.1 of the General Terms and Conditions, 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 in section B.1, above, and the number of hours of downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 2. The facility shall submit annual reports to the Ohio EPA, which at a minimum specify the total methanol and formaldehyde emissions from the 25,000 gallon formaldehyde storage tanks, for the previous calendar year (January 1 through December 31). The 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 limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

The vapor collection system shall vent to the resin plant thermal oxidizer; and the thermal oxidizer shall achieve and maintain either a minimum 98% destruction efficiency, by weight, or an outlet concentration of less than 20 parts per million (ppm), by volume, dry basis.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. the emission testing shall be conducted approximately 6 months and 2.5 years after permit issuance and within 6 months prior to permit expiration;

ii. the emission testing shall be conducted to demonstrate compliance at the outlet concentration equivalent to the hourly allowable for methanol, formaldehyde and phenol and/or the control efficiency across the thermal oxidizer. 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 3745-21-10(C)(2)(b). 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;

iii. the following test method shall be employed to demonstrate compliance: Methods 1-4 and 320 of 40 CFR Part 60, Appendix A for formaldehyde and methanol concentrations at the inlet and outlet to determine VOC control efficiency. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and

iv. the test 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 person 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 from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for methanol may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

Emission Limitation:

Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.191 lb/hr and 0.835 ton/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for formaldehyde may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

Emission Limitation:

Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for carbon monoxide may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A-F.

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

Facility ID: 0125040904 Emissions Unit ID: T042 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>
urea-formaldehyde solution storage tanks T042 (25,000 gallons) vented to the resin plant thermal oxidizer	OAC rule 3745-35-07(B)(2) (Synthetic Minor to avoid Title V (TV) and Maximum Achievable Control Technology requirements (MACT))	Methanol emissions from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr. Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.191 lb/hr and 0.835 ton/yr. Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.
	OAC rule 3745-21-07(D)	See sections A.2.a, A.2.b and B.1 below. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07(B)(2).

2. Additional Terms and Conditions

- (a) All of the OC emissions from the following emissions units shall be vented to the resin plant thermal oxidizer: methanol storage tank T065, resin kettle K-1 P004; resin kettle K-3 P006; 24 resin storage tanks T013-T016, T019-T021, T024, T025, T027, T028, T031 -T036, T057 - T062, Z011; 9 formaldehyde T039 - T041, T051- T056 and 8 urea-formaldehyde solution storage tanks T042-T046, T048, and T049; 1 phenol formaldehyde load station J003 and 1 urea-formaldehyde/formaldehyde load station J004.

The restrictions to potential to emit (PTE) for the above listed emission units at this facility will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC) emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable terms and conditions specified in section II.A.1, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart HHHHH.

A 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 8 urea-formaldehyde storage tanks are identical and have been placed on permit to operate registration status: T043 - T046, T048, T049 and T067. Although these storage tanks have been placed on registration status, they are subject to the control requirements specified in A.1 and A.2.a.

B. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when this emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (or equivalent to 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated that this 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 (or in equivalent degrees Celsius). 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 oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (or equivalent 27.8 degrees Celsius)

below the average combustion temperature during the most recent stack test that demonstrated compliance; and

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

D. Reporting Requirements

1. In accordance with the General Terms and Conditions, the permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in section B.1, above; and the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The facility shall submit annual reports to the Ohio EPA, which at a minimum specify the total methanol and formaldehyde emissions from the urea-formaldehyde storage tanks as emissions from resin plant thermal oxidizer, for the previous calendar year (January 1 through December 31). The 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 limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
The vapor collection system shall vent to the resin plant thermal oxidizer; and the thermal oxidizer shall achieve and maintain either a minimum 98% destruction efficiency, by weight, or an outlet concentration of less than 20 parts per million (ppm), by volume, dry basis.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. the emission testing shall be conducted approximately 6 months and 2.5 years after permit issuance and within 6 months prior to permit expiration;

ii. the emission testing shall be conducted to demonstrate compliance at the outlet concentration equivalent to the hourly allowable for methanol, formaldehyde and phenol and/or the control efficiency across the thermal oxidizer. 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 3745-21-10(C)(2)(b). 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;

iii. the following test method shall be employed to demonstrate compliance: Methods 1-4 and 320 of 40 CFR Part 60, Appendix A for formaldehyde and methanol concentrations at the inlet and outlet to determine VOC control efficiency. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and

iv. the test 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 person 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.

Methanol emissions from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for methanol may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

Emission Limitation:

Formaldehyde emissions from the resin plant thermal oxidizer stack shall not exceed 0.191 lb/hr and 0.835 ton/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for formaldehyde may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

Emission Limitation:

Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for carbon monoxide may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A-F.

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

Facility ID: 0125040904 Emissions Unit ID: T065 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>
methanol storage tank (412,845 gallon) with vapor-recovery vented to the formaldehyde plant 1 and resin plant thermal oxidizer when plant 1 is down	OAC rule 3745-35-07(B)(2) (Synthetic Minor to avoid Title V (TV) and Maximum Achievable Control Technology requirements (MACT))	Methanol emissions from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr. Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.
	OAC rule 3745-21-07(D)	See sections A.2.a, A.2.b A.2.c and B.1 below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B)(2).

2. Additional Terms and Conditions

- (a) The tank emissions shall be vented to a vapor collection system to capture vapors generated during transfer and storage of methanol. The vapor collection system shall vent to fresh air inlet of formaldehyde plant 1 and, during formaldehyde plant down time, to the resin plant thermal oxidizer.

The resin plant thermal oxidizer shall achieve and maintain a minimum of either 98% destruction efficiency, by weight, or an outlet concentration of less than 20 parts per million (ppm), by volume.

The vapor collection system is vented to the fresh air intake of the formaldehyde plant 1, which would achieve greater than 99% reduction efficiency. The worse-case PTE is based upon a maximum annual throughput of 28,748,727 gallons (94, 871 tons) of methanol and the 98% control efficiency requirement for the emissions vented to the resin plant thermal oxidizer.

All of the OC emissions from the following emissions units shall be vented to the resin plant thermal oxidizer: methanol storage tank T065, resin kettle K-1 P004; resin kettle K-3 P006; 24 resin storage tanks T013-T016, T019-T021, T024, T025, T027, T028, T031 -T036, T057 - T062, Z011; 9 formaldehyde T039 - T041, T051- T056 and 8 urea-formaldehyde solution storage tanks T042-T046, T048, and T049; 1 phenol formaldehyde load station J003 and 1 urea-formaldehyde/formaldehyde load station J004.

The restrictions to potential to emit (PTE) for the above listed emission units at this facility will ensure that the individual hazardous air pollutant (IHAP), and total combined hazardous air pollutant (TCHAP) and organic compound (OC) emissions will not exceed the Title V and MACT applicability thresholds of 10 tons IHAP and/or 25 tons TCHAP emissions and 100 tons OC per rolling, 12-month period, respectively.

Therefore, the permittee, by complying with the federally enforceable terms and conditions specified in section II.A.1, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR

Part 63 Subpart HHHHH.

A 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.

All methanol feed lines and vapor collection lines shall be equipped with fittings which are vapor tight. The permittee shall monitor the pumps and valves in the methanol feed system according to the leak detection and repair program for the formaldehyde plants. A calculated methanol emission component of fugitive emissions is quantified in section A.1.a of plant 1 (P001) and plant 2 (P003).

B. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when this emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (or equivalent to 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated that this emissions unit was in compliance.
2. The permittee shall not permit methanol to be spilled or handled in any other manner that would result in evaporation.

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 (or in equivalent degrees Celsius). 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 oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (or equivalent to 27.8 degrees Celsius) below the average combustion temperature during the most recent stack test that demonstrated compliance; and

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

D. Reporting Requirements

1. In accordance with the General Terms and Conditions, the permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in section B.1, above; and the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The facility shall submit annual reports to the Ohio EPA, which at a minimum specify the methanol emission from the methanol storage tank as total emissions from resin plant thermal oxidizer, for the previous calendar year (January 1 through December 31). The 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 in section A.I. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
The resin plant thermal oxidizer shall achieve and maintain a minimum of either 98% destruction efficiency, by weight, or an outlet concentration of less than 20 parts per million (ppm), by volume.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. the emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration;

ii. the emission testing shall be conducted to demonstrate compliance with The emission testing shall be conducted to demonstrate compliance with the VOC control efficiency, by weight, or an outlet concentration of less than 20 ppm, by volume . 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 3745-21-10(C)(2)(b). 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;

iii. the following test methods shall be employed to demonstrate compliance with the VOC control efficiency or less than 20 ppm concentration: Methods 1-4 and 320 of 40 CFR Part 60, Appendix A for VOC control efficiency or outlet concentrations of formaldehyde, methanol, and phenol. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and

iv. the test 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 person 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 from the resin plant thermal oxidizer stack shall not exceed 0.175 lb/hr and 0.765 ton/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for methanol may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

Emission Limitation:

Carbon monoxide emissions from the thermal oxidizer stack shall not exceed 4.2 lbs/hr and 18.4 tons/yr.

Applicable Compliance Method:

Compliance with the hourly emission limitation for carbon monoxide may be demonstrated through the emission testing required in section E.1.a.

Compliance with the annual emission limitation shall be assured by record keeping required in section C.1 and compliance demonstration with hourly emission limitation required above.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A-F.