



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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50 W. Town St., Suite 700
Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

4/7/2009

Certified Mail

Earl Seibert
FLINT GROUP PIGMENTS
410 GLENDALE-MILFORD ROAD
CINCINNATI, OH 45215

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431483219
Permit Number: P0100337
Permit Type: Renewal
County: Hamilton

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
HCDOES; Indiana; Kentucky

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This FEPTIO is for five existing varnish kettles (P001-P005) at Flint Group Pigments. All five emissions units are vented to a thermal oxidizer to control the organic compound emissions.

3. Facility Emissions and Attainment Status:

Flint Group Pigments is located in Hamilton County which is designated as non-attainment for PM2.5 and ozone and attainment for all the other criteria pollutants. The facility would be major for volatile organic compound/organic compound emissions without the limits established in this permit. The facility is non-major for the other criteria pollutants including HAP's.

4. Source Emissions:

This FEPTIO will limit the production rate of emissions units P001-P005 to 60,000 tons of product per year which limits the combined organic compound emissions to 10.0 tons per year. OAC rule 3745-21-07(M)(2) requires the emissions units to be equipped with a control system that reduces the organic compound emissions by an overall control efficiency of at least 85%. The company employs a thermal oxidizer to control the organic compound emissions. The permittee will maintain records of the production rate, organic compound emissions, and the thermal oxidizer temperature to verify compliance with the permit limits. The permittee will conduct a performance test to demonstrate compliance with overall control efficiency limit.

5. Conclusion:

With the federally enforceable limitations established in this FEPTIO, the permittee will be a synthetic minor facility for OC emissions. The permittee will maintain records and submit reports to demonstrate compliance with the permit limitations. The permittee will also conduct a performance test to demonstrate compliance with the overall control efficiency limit.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>OC</u>	<u>10.0</u>

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
FLINT GROUP PIGMENTS

Issue Date: 4/7/2009

Permit Number: P0100337

Permit Type: Renewal

Permit Description: Five Varnish Kettles Controlled with a Thermal Oxidizer - Renewal of FESOP/FEPTIO

Facility ID: 1431483219

Facility Location: FLINT GROUP PIGMENTS
410 GLENDALE-MILFORD ROAD,
CINCINNATI, OH 45215

Facility Description: Paint and Coating Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mike Kramer at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

**Air Pollution Permit-to-Install and Operate
for
FLINT GROUP PIGMENTS**

Facility ID: 1431483219
Permit Number: P0100337
Permit Type: Renewal
Issued: 4/7/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
FLINT GROUP PIGMENTS

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

 2. Who is responsible for complying with this permit? 4

 3. What records must I keep under this permit? 4

 4. What are my permit fees and when do I pay them?..... 4

 5. When does my PTIO expire, and when do I need to submit my renewal application? 4

 6. What happens to this permit if my project is delayed or I do not install or modify my source? 5

 7. What reports must I submit under this permit? 5

 8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5

 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5

 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6

 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6

 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6

 13. Can I transfer this permit to a new owner or operator?..... 6

 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7

 15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions..... 8

C. Emissions Unit Terms and Conditions 10

 1. P001, Patterson Varnish Kettle, K-9.....11

 2. P002, Patterson Varnish Kettle, K-8.....17

 3. P003, Patterson Varnish Kettle, K-7.....23

 4. P004, Patterson Varnish Kettle, K-6.....29

 5. P005, Patterson Varnish Kettle, K-3.....35



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100337

Facility ID: 1431483219

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1431483219
Application Number(s): A0032067
Permit Number: P0100337
Permit Description: Five Varnish Kettles Controlled with a Thermal Oxidizer - Renewal of FESOP/FEPTIO
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 4/7/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

FLINT GROUP PIGMENTS
410 GLENDALE-MILFORD ROAD
CINCINNATI, OH 45215

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0100337

Permit Description: Five Varnish Kettles Controlled with a Thermal Oxidizer - Renewal of FESOP/FEPTIO

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P001
Company Equipment ID:	PATTERSON VARNISH KETTLE, K-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	PATTERSON VARNISH KETTLE, K-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	PATTERSON VARNISH KETTLE, K-7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	PATTERSON VARNISH KETTLE, K-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	PATTERSON VARNISH KETTLE, K-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100337

Facility ID: 1431483219

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100337

Facility ID: 1431483219

Effective Date: To be entered upon final issuance

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100337

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100337

Facility ID: 1431483219

Effective Date: To be entered upon final issuance

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100337

Facility ID: 1431483219

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P001, PATTERSON VARNISH KETTLE, K-9

Operations, Property and/or Equipment Description:

Varnish Kettle Controlled with a Thermal Oxidizer - #9

a) 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. b)(2)b., c)(1), d)(1), and e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)(2)	See b)(2)a.
b.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)b. and (c)(1).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

b. The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

c) Operational Restrictions

(1) The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the production rate for each month for emissions units P001 through P005;
 - b. the monthly organic compound emissions for emissions units P001 through P005;
 - c. the rolling, 12-month summation of the production rates for emissions units P001 through P005; and
 - d. the rolling, 12-month summation of the organic compound emissions for emissions units P001 through P005.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to 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 the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
- (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of the production rate;
 - ii. all exceedances of the rolling, 12-month emissions limitation;



- iii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range; and
 - iv. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(2)b. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on multiplying the OC emissions factor, in pounds per ton from the most recent emissions test demonstrating compliance by the updated rolling, 12-month production rate, in tons. The record keeping for OC emissions is outlined in d)(1).



b. Emission Limitation:

The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in d)(1).

c. Emission Limitation:

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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 within 6 months after permit issuance.
- ii. The emission testing shall be conducted to demonstrate compliance with the above OC control efficiency limitation.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Method 25 or 25A.

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

- iv. 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- vi. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the



emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- vii. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.



2. P002, PATTERSON VARNISH KETTLE, K-8

Operations, Property and/or Equipment Description:

Varnish Kettle Controlled with a Thermal Oxidizer - #8

a) 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. b)(2)b., c)(1), d)(1), and e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)(2)	See b)(2)a.
b.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)b. and c)(1).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

b. The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

c) Operational Restrictions

(1) The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the production rate for each month for emissions units P001 through P005;
 - b. the monthly organic compound emissions for emissions units P001 through P005;
 - c. the rolling, 12-month summation of the production rates for emissions units P001 through P005; and
 - d. the rolling, 12-month summation of the organic compound emissions for emissions units P001 through P005.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to 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 the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
- (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of the production rate;
 - ii. all exceedances of the rolling, 12-month emissions limitation;



- iii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range; and
- iv. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(2)b. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on multiplying the OC emissions factor, in pounds per ton from the most recent emissions test demonstrating compliance by the updated rolling, 12-month production rate, in tons. The record keeping for OC emissions is outlined in d)(1).



b. Emission Limitation:

The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in d)(1).

c. Emission Limitation:

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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 within 6 months after permit issuance.
- ii. The emission testing shall be conducted to demonstrate compliance with the above OC control efficiency limitation.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Method 25 or 25A.

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

- iv. 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- vi. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the



emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- vii. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) None.



3. P003, PATTERSON VARNISH KETTLE, K-7

Operations, Property and/or Equipment Description:

Varnish Kettle Controlled with a Thermal Oxidizer - #7

a) 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. b)(2)b., c)(1), d)(1), and e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)(2)	See b)(2)a.
b.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)b. and (c)(1).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

b. The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

c) Operational Restrictions

(1) The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the production rate for each month for emissions units P001 through P005;
 - b. the monthly organic compound emissions for emissions units P001 through P005;
 - c. the rolling, 12-month summation of the production rates for emissions units P001 through P005; and
 - d. the rolling, 12-month summation of the organic compound emissions for emissions units P001 through P005.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to 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 the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
- (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of the production rate;
 - ii. all exceedances of the rolling, 12-month emissions limitation;



- iii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range; and
 - iv. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(2)b. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on multiplying the OC emissions factor, in pounds per ton from the most recent emissions test demonstrating compliance by the updated rolling, 12-month production rate, in tons. The record keeping for OC emissions is outlined in d)(1).



b. Emission Limitation:

The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in d)(1).

c. Emission Limitation:

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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 within 6 months after permit issuance.
- ii. The emission testing shall be conducted to demonstrate compliance with the above OC control efficiency limitation.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Method 25 or 25A.

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

- iv. 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- vi. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the



emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- vii. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) None.



4. P004, PATTERSON VARNISH KETTLE, K-6

Operations, Property and/or Equipment Description:

Varnish Kettle Controlled with a Thermal Oxidizer - #6

a) 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. b)(2)b., c)(1), d)(1), and e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)(2)	See b)(2)a.
b.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)b. and (c)(1).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

b. The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

c) Operational Restrictions

(1) The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the production rate for each month for emissions units P001 through P005;
 - b. the monthly organic compound emissions for emissions units P001 through P005;
 - c. the rolling, 12-month summation of the production rates for emissions units P001 through P005; and
 - d. the rolling, 12-month summation of the organic compound emissions for emissions units P001 through P005.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to 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 the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
- (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of the production rate;
 - ii. all exceedances of the rolling, 12-month emissions limitation;



- iii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range; and
 - iv. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(2)b. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on multiplying the OC emissions factor, in pounds per ton from the most recent emissions test demonstrating compliance by the updated rolling, 12-month production rate, in tons. The record keeping for OC emissions is outlined in d)(1).



b. Emission Limitation:

The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in d)(1).

c. Emission Limitation:

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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 within 6 months after permit issuance.
- ii. The emission testing shall be conducted to demonstrate compliance with the above OC control efficiency limitation.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Method 25 or 25A.

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

- iv. 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- vi. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the



emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- vii. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) None.



5. P005, PATTERSON VARNISH KETTLE, K-3

Operations, Property and/or Equipment Description:

Varnish Kettle Controlled with a Thermal Oxidizer - #3

a) 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. b)(2)b., c)(1), d)(1), and e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)(2)	See b)(2)a.
b.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)b. and (c)(1).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

b. The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

c) Operational Restrictions

(1) The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the production rate for each month for emissions units P001 through P005;
 - b. the monthly organic compound emissions for emissions units P001 through P005;
 - c. the rolling, 12-month summation of the production rates for emissions units P001 through P005; and
 - d. the rolling, 12-month summation of the organic compound emissions for emissions units P001 through P005.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to 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 the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
- (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of the production rate;
 - ii. all exceedances of the rolling, 12-month emissions limitation;



- iii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range; and
- iv. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(2)b. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

The combined annual emissions of organic compounds from emissions units P001 through P005 shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on multiplying the OC emissions factor, in pounds per ton from the most recent emissions test demonstrating compliance by the updated rolling, 12-month production rate, in tons. The record keeping for OC emissions is outlined in d)(1).



b. Emission Limitation:

The maximum annual production rate for emissions units P001 through P005 shall not exceed 60,000 tons of product based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in d)(1).

c. Emission Limitation:

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eighty-five percent by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

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 within 6 months after permit issuance.
- ii. The emission testing shall be conducted to demonstrate compliance with the above OC control efficiency limitation.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Method 25 or 25A.

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

- iv. 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- vi. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the



emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- vii. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) None.