State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

03/14/05

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

04-48-01-0370
Tembec BTLSR Inc
James F. Anderson
P.O. BOX 2570
2112 SYLVAN AVE
TOLEDO, OH 43606

Dear James F. Anderson:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Toledo Div of Environmental Services.

Sincerely,

Michael W. Ahern

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

cc: Toledo Div of Environmental Services
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **03/14/05**	Effective Date: **04/04/05**	Expiration Date: **04/04/10**

This document constitutes issuance of a Title V permit for Facility ID: 04-48-01-0370 to:
Tembec BTLSR Inc
2525 JEAN-DESY
LONGUEUIL, QUEBEC J4G 1G6
LONGUEUIL, QUEBEC J4G 1G6, OH 43606

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Boiler #1)
Provides space heat and process steam for facility.

B002 (Boiler #2)
Provides space heat and process steam for facility.

P001 ("A" System Resin Spray Dryer)
Production unit includes equipment used to produce formaldehyde resins.

P002 ("B" System Resin Spray Dryer)
Production unit includes equipment used to produce formaldehyde resins.

P003 ("C" System Resin Spray Dryer)
Production unit includes equipment used to produce formaldehyde resins.

Z008 (Kettle Reactor)
Kettle reactor used to make formaldehyde resin.

Z014 (Reactor #1)
One of four reactor kettles used to produce liquid formaldehyde resins.

Z015 (Reactor #2)
One of four reactor kettles used to produce liquid formaldehyde resins.

Z016 (Reactor #3)
One of four reactor kettles used to produce liquid formaldehyde resins.

Z018 (Reactor #4)
One of four reactor kettles used to produce liquid formaldehyde resins.

Z019 (Reactor #5)
One of four reactor kettles used to produce liquid formaldehyde resins.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Toledo Div of Environmental Services
348 South Erie Street
Toledo, OH 43602-1633
(419) 936-3015

Ohio Environmental Protection Agency

Joseph P. Koncelik
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement overrides the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
ii. Compliance certifications shall include the following:
(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any monitoring, record keeping, reporting, or testing requirements, applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii;

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; and

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. 40 CFR Part 63, Subpart OOO

The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart OOO in accordance with 40 CFR Part 63, Subpart OOO (including the Table(s) and Appendix(ices) referenced in Subpart OOO) which are included in the text of Attachment 1 hereto, and are hereby incorporated into this permit as if fully written.

Ordinarily, these requirements would be incorporated into Part III of this permit; however, incorporating Subpart OOO into Part III of this permit was not practical due to technical incompatibilities and the limitations of the STARS program. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into STARS format.

2. 40 CFR Part 63, Subpart UU

The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart UU in accordance with 40 CFR Part 63, Subpart UU (including the Table(s) and Appendix(ices) referenced in Subpart UU) which are included in the text of Attachment 2 hereto, and are hereby incorporated into this permit as if fully written.

Ordinarily, these requirements would be incorporated into Part III of this permit; however, incorporating Subpart UU into Part III of this permit was not practical due to technical incompatibilities and the limitations of the STARS program. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into STARS format.

3. 40 CFR Part 63, Subpart A

The permittee is subject to the general requirements specified in 40 CFR Part 63, Subpart A in accordance with 40 CFR Part 63, Subpart A (including the Table(s) and Appendix(ices) referenced in Subpart A) which are included in the text of Attachment 3 hereto, and are hereby incorporated into this permit as if fully written.

Ordinarily, these requirements would be incorporated into Part III of this permit; however, incorporating Subpart A into Part III of this permit was not practical due to technical incompatibilities and the limitations of the STARS program. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into STARS format.

4. This facility developed and registered a risk management plan pursuant to section 112(r) of the Act and is required to comply with the requirements of section 112(r) and the regulations adopted thereunder.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P006 - catalyst blender;
Z007 - blow-off hood;
Z009 - formaldehyde tank;
Z010 - fuel oil tank;
Z011 - PVA tank; and
Z017 - cooling tower.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #1 (B001)

Activity Description: Provides space heat and process steam for facility.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
4.125 mmBtu/hr boiler, fired with natural gas, no. 2 fuel oil and/or no. 6 fuel oil, with no controls	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(C)(1)	0.40 pound of particulates per million Btu actual heat input
	OAC rule 3745-18-06	exempt, see section A.I.2.a

2. Additional Terms and Conditions

2.a Fueling burning equipment which have rated heat input capacities equal to, or less than, 10 mmBtu/hr total rated capacity are exempt from the requirements of this rule.

II. Operational Restrictions

1. The permittee shall burn only natural gas, no. 2 fuel oil and/or no. 6 fuel oil in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, no. 2 fuel oil and/or no. 6 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day during which the permittee burns no. 6 fuel oil, the permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, no. 2 fuel oil and/or no. 6 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Toledo Division of Environmental Services (TDOES) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

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

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

V. Testing Requirements (continued)

1.b Emission Limitation:

0.40 pound of particulate per million Btu actual heat input

Applicable Compliance Method:

When burning natural gas, compliance may be demonstrated by dividing the particulate emission factor for natural gas combustion (1.9 lbs/mmcuft) obtained from AP-42, 5th Edition, Table 1.4-2, dated July, 1998, by the heating value of natural gas (1020 mmBtu/mmcuft).

When burning no. 2 fuel oil, compliance may be demonstrated by dividing the particulate emission factor for no. 2 fuel oil combustion (2 lbs/1000 gal) obtained from AP-42, 5th Edition, Table 1.3-1, dated September, 1998, by the heating value of no. 2 fuel oil (140 mmBtu/1000 gal).

When burning no. 6 fuel oil, compliance may be demonstrated by dividing the particulate emission factor for no. 6 fuel oil combustion (10 lbs/1000 gal) obtained from AP-42, 5th Edition, Table 1.3-1, dated September, 1998, by the heating value of no. 6 fuel oil (150 mmBtu/1000 gal).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the method(s) and procedures specified in OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #2 (B002)

Activity Description: Provides space heat and process steam for facility.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
4.125 mmBtu/hr boiler, fired with natural gas, no. 2 fuel oil and/or no. 6 fuel oil, with no controls	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(C)(1)	0.40 pound of particulates per million Btu actual heat input
	OAC rule 3745-18-06	exempt, see section A.I.2.a

2. Additional Terms and Conditions

2.a Fueling burning equipment which have rated heat input capacities equal to, or less than, 10 mmBtu/hr total rated capacity are exempt from the requirements of this rule.

II. Operational Restrictions

1. The permittee shall burn only natural gas, no. 2 fuel oil and/or no. 6 fuel oil in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, no. 2 fuel oil and/or no. 6 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day during which the permittee burns no. 6 fuel oil, the permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, no. 2 fuel oil and/or no. 6 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Toledo Division of Environmental Services (TDOES) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

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

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

V. Testing Requirements (continued)

1.b Emission Limitation:

0.40 pound of particulate per million Btu actual heat input

Applicable Compliance Method:

When burning natural gas, compliance may be demonstrated by dividing the particulate emission factor for natural gas combustion (1.9 lbs/mmcuft) obtained from AP-42, 5th Edition, Table 1.4-2, dated July, 1998, by the heating value of natural gas (1020 mmBtu/mmcuft).

When burning no. 2 fuel oil, compliance may be demonstrated by dividing the particulate emission factor for no. 2 fuel oil combustion (2 lbs/1000 gal) obtained from AP-42, 5th Edition, Table 1.3-1, dated September, 1998, by the heating value of no. 2 fuel oil (140 mmBtu/1000 gal).

When burning no. 6 fuel oil, compliance may be demonstrated by dividing the particulate emission factor for no. 6 fuel oil combustion (10 lbs/1000 gal) obtained from AP-42, 5th Edition, Table 1.3-1, dated September, 1998, by the heating value of no. 6 fuel oil (150 mmBtu/1000 gal).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the method(s) and procedures specified in OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: "A" System Resin Spray Dryer (P001)

Activity Description: Production unit includes equipment used to produce formaldehyde resins.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Resin dryer "A" with wet scrubber	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	5.14 lbs/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See section A.I.2.a below.
	40 CFR Part 63, Subpart OOO	exempt, existing continuous process vent
		See Attachment 1.

2. Additional Terms and Conditions

2.a This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information at the beginning of each shift for each day the emissions unit is in operation:

a. visually confirm that the stack emissions are being properly controlled; and

b. visually confirm that the scrubber pump is running and that the flow rate from the drain lines is adequate.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information at every system start-up:

a. visually inspect the scrubber chamber and the orifices to ensure that they are free from blockage;

b. conduct a water flow test for the orifices, and visually confirm that they are free from blockage;

c. install the water nozzles into the orifices, and again conduct a visually confirmed water flow test;

d. visually inspect the demister bundles to ensure that they are not overloaded or ready to be changed;

e. conduct a start up test of the scrubber unit, and visually confirm that the scrubber pump is running and that the flow rate from the drain lines is adequate; and

f. visually confirm that the stack emissions are being properly controlled.

(Authority for term: OAC rule 3745-77-07(C)(1))

3. The permittee shall collect and record the following information each calendar year for the drying operation (for the purpose of determining the total annual emissions from this emissions unit):

a. the company identification for each feed stock employed;

b. the number of pounds of each feed stock employed;

c. the number of pounds of all feed stocks employed; and

d. the annual particulate emission rate, i.e., the particulate emission factor determined during the most recent emissions test which demonstrated compliance with the emission limitation, in pounds of particulate per pound of feed stock, multiplied by the annual summation of the feed stocks employed, in pounds of feed stock per year.

Note: The feed stock information must be for the feed stock as employed, including any steam added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify each day during which the scrubber inspection form(s) indicates a problem with scrubber operation, (b) the cause(s) of the problem and (c) the corrective action which has been or will be taken to prevent similar problems in the future. These reports shall be submitted to the Toledo Division of Environmental Services (TDOES) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements (continued)

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the TDOES by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

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

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:

5.14 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Resin dryer "A" with wet scrubber		

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The average hourly feed stock rate for this emissions unit shall not exceed by more than 10% the feed rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for particulates. Operation of this emissions unit at a feed rate greater than the compliant level is not necessarily indicative of an emission violation, but rather serves as a trigger level for additional testing and/or further investigation to establish compliance with the emission limitations. The permittee may increase the average feed rate by demonstrating compliance during an emission test, performed in accordance with the procedures and method(s) as detailed in OAC rule 3745-17-03(B)(10), at a higher average hourly feed stock rate.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the drying operation:

a. the number of pounds of all feed stocks employed;

b. the total number of hours the emissions unit was in operation; and

c. the average hourly feed stock rate, (a)/(b), in pounds per hour average.

[Note: The feed stock information must be for the feed stocks as employed, including any steam added at the emissions unit.]

IV. Reporting Requirements

1. If for any reason the average hourly feed stock rate exceeds by more than 10% the feed rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for particulates, the following information shall be reported within 5 business days after the exceedance:

a. the date of the exceedance;

b. the time interval over which the exceedance occurred;

c. the value of the exceedance;

d. the cause(s) of the exceedance;

e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and

f. a copy of data and/or information which shows the exceedance.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: "B" System Resin Spray Dryer (P002)

Activity Description: Production unit includes equipment used to produce formaldehyde resins.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Resin dryer "B" with wet scrubber	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	5.14 lbs/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See section A.I.2.a below.
	40 CFR Part 63, Subpart OOO	exempt, existing continuous process vent
		See Attachment 1.

2. Additional Terms and Conditions

2.a This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information at the beginning of each shift for each day the emissions unit is in operation:

a. visually confirm that the stack emissions are being properly controlled; and

b. visually confirm that the scrubber pump is running and that the flow rate from the drain lines is adequate.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information at every system start-up:

a. visually inspect the scrubber chamber and the orifices to ensure that they are free from blockage;

b. conduct a water flow test for the orifices, and visually confirm that they are free from blockage;

c. install the water nozzles into the orifices, and again conduct a visually confirmed water flow test;

d. visually inspect the demister bundles to ensure that they are not overloaded or ready to be changed;

e. conduct a start up test of the scrubber unit, and visually confirm that the scrubber pump is running and that the flow rate from the drain lines is adequate; and

f. visually confirm that the stack emissions are being properly controlled.

(Authority for term: OAC rule 3745-77-07(C)(1))

3. The permittee shall collect and record the following information each calendar year for the drying operation (for the purpose of determining the total annual emissions from this emissions unit):

a. the company identification for each feed stock employed;

b. the number of pounds of each feed stock employed;

c. the number of pounds of all feed stocks employed; and

d. the annual particulate emission rate, i.e., the particulate emission factor determined during the most recent emissions test which demonstrated compliance with the emission limitation, in pounds of particulate per pound of feed stock, multiplied by the annual summation of the feed stocks employed, in pounds of feed stock per year.

Note: The feed stock information must be for the feed stock as employed, including any steam added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify each day during which the scrubber inspection form(s) indicates a problem with scrubber operation, (b) the cause(s) of the problem and (c) the corrective action which has been or will be taken to prevent similar problems in the future. These reports shall be submitted to the Toledo Division of Environmental Services (TDOES) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements (continued)

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the TDOES by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

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

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:

5.14 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Resin dryer "B" with wet scrubber		

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The average hourly feed stock rate for this emissions unit shall not exceed by more than 10% the feed rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for particulates. Operation of this emissions unit at a feed rate greater than the compliant level is not necessarily indicative of an emission violation, but rather serves as a trigger level for additional testing and/or further investigation to establish compliance with the emission limitations. The permittee may increase the average feed rate by demonstrating compliance during an emission test, performed in accordance with the procedures and method(s) as detailed in OAC rule 3745-17-03(B)(10), at a higher average hourly feed stock rate.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the drying operation:

a. the number of pounds of all feed stocks employed;

b. the total number of hours the emissions unit was in operation; and

c. the average hourly feed stock rate, (a)/(b), in pounds per hour average.

[Note: The feed stock information must be for the feed stocks as employed, including any steam added at the emissions unit.]

IV. Reporting Requirements

1. If for any reason the average hourly feed stock rate exceeds by more than 10% the feed rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for particulates, the following information shall be reported within 5 business days after the exceedance:

a. the date of the exceedance;

b. the time interval over which the exceedance occurred;

c. the value of the exceedance;

d. the cause(s) of the exceedance;

e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and

f. a copy of data and/or information which shows the exceedance.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: "C" System Resin Spray Dryer (P003)

Activity Description: Production unit includes equipment used to produce formaldehyde resins.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Resin dryer "C" with wet scrubber	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	4.63 lbs/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See section A.I.2.a below.
	40 CFR Part 63, Subpart OOO	exempt, existing continuous process vent
		See Attachment 1.

2. Additional Terms and Conditions

2.a This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information at the beginning of each shift for each day the emissions unit is in operation:

a. visually confirm that the stack emissions are being properly controlled; and

b. visually confirm that the scrubber pump is running and that the flow rate from the drain lines is adequate.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information at every system start-up:

a. visually inspect the scrubber chamber and the orifices to ensure that they are free from blockage;

b. conduct a water flow test for the orifices, and visually confirm that they are free from blockage;

c. install the water nozzles into the orifices, and again conduct a visually confirmed water flow test;

d. visually inspect the demister bundles to ensure that they are not overloaded or ready to be changed;

e. conduct a start up test of the scrubber unit, and visually confirm that the scrubber pump is running and that the flow rate from the drain lines is adequate; and

f. visually confirm that the stack emissions are being properly controlled.

(Authority for term: OAC rule 3745-77-07(C)(1))

3. The permittee shall collect and record the following information each calendar year for the drying operation (for the purpose of determining the total annual emissions from this emissions unit):

a. the company identification for each feed stock employed;

b. the number of pounds of each feed stock employed;

c. the number of pounds of all feed stocks employed; and

d. the annual particulate emission rate, i.e., the particulate emission factor determined during the most recent emissions test which demonstrated compliance with the emission limitation, in pounds of particulate per pound of feed stock, multiplied by the annual summation of the feed stocks employed, in pounds of feed stock per year.

Note: The feed stock information must be for the feed stock as employed, including any steam added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify each day during which the scrubber inspection form(s) indicates a problem with scrubber operation, (b) the cause(s) of the problem and (c) the corrective action which has been or will be taken to prevent similar problems in the future. These reports shall be submitted to the Toledo Division of Environmental Services (TDOES) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements (continued)

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the TDOES by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

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

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:

4.63 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Resin dryer "C" with wet scrubber		

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The average hourly feed stock rate for this emissions unit shall not exceed by more than 10% the feed rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for particulates. Operation of this emissions unit at a feed rate greater than the compliant level is not necessarily indicative of an emission violation, but rather serves as a trigger level for additional testing and/or further investigation to establish compliance with the emission limitations. The permittee may increase the average feed rate by demonstrating compliance during an emission test, performed in accordance with the procedures and method(s) as detailed in OAC rule 3745-17-03(B)(10), at a higher average hourly feed stock rate.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the drying operation:

a. the number of pounds of all feed stocks employed;

b. the total number of hours the emissions unit was in operation; and

c. the average hourly feed stock rate, (a)/(b), in pounds per hour average.

[Note: The feed stock information must be for the feed stocks as employed, including any steam added at the emissions unit.]

IV. Reporting Requirements

1. If for any reason the average hourly feed stock rate exceeds by more than 10% the feed rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for particulates, the following information shall be reported within 5 business days after the exceedance:

a. the date of the exceedance;

b. the time interval over which the exceedance occurred;

c. the value of the exceedance;

d. the cause(s) of the exceedance;

e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and

f. a copy of data and/or information which shows the exceedance.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Kettle Reactor (P007)

Activity Description: Kettle reactor used to make formaldehyde resin.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
amino/phenolic resin processing unit, general provisions	OAC rule 3745-21-07(G)(2)	See section A.I.2.a.
	40 CFR Part 63, Subpart A	See section A.I.2.b.
	40 CFR Part 63, Subpart OOO	See section A.I.2.c.
reactor batch process vent controlled by a condenser with spray wash system	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	1.8 lbs/hr of particulate emissions
	40 CFR Part 63, Subpart OOO	See section A.I.2.d.
heat exchange systems	40 CFR Part 63, Subpart OOO	See section A.I.2.e.
equipment leaks, controlled by equipment design and operating and maintenance programs	40 CFR Part 63, Subpart OOO	See section A.I.2.f.
storage vessels	40 CFR Part 63, Subpart OOO	See section A.I.2.g.

2. Additional Terms and Conditions

2.a This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

2.b i. 40 CFR Part 63, Subpart A [see Attachment 3] provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 63.

ii. Table 1 of 40 CFR Part 63, Subpart OOO [see Attachment 1] specifies the provisions of 40 CFR Part 63, Subpart A that apply and those provisions that do not apply.

(Authority for term: 40 CFR 63.1400(j))

2. Additional Terms and Conditions (continued)

2.c The provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1] apply to processes that produce amino/phenolic resins and that are located at a plant site that is a major source. This emissions unit is utilized to produce amino/phenolic resins at the BTLSR Toledo plant site, which is a major source of the hazardous air pollutant (HAP) formaldehyde. This emissions unit is therefore subject to the provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1].

(Authority for term: 40 CFR 63.1400(a))

2.d Except as otherwise provided in 40 CFR 63.1406 [see Attachment 1], the permittee shall control organic HAP emissions from the reactor batch process vent by complying with either of the following:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

(Authority for term: 40 CFR 63.1406(a)(2))

2.e There are no applicable requirements for existing heat exchangers (cooling coils) with a minimum cooling water pressure more than 35 kilopascals greater than the maximum process side pressure.

(Authority for term: 40 CFR 63.1409(a)(1))

2.f Except as otherwise provided in 40 CFR Part 63, Subpart OOO [see Attachment 1], the permittee shall establish a leak detection and repair program which complies with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2]. These requirements are described in 40 CFR 63.1029 [see Attachment 2] and 63.1410 [see Attachment 1]. These requirements apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.

(Authority for term: 40 CFR 63.1410)

2.g There are no applicable requirements for existing storage vessels with a capacity of less than 50,000 gallons. The existing storage vessels include the following:

formaldehyde tank (Z009) - 14,600 gallons;
fuel oil tank (Z010) - 10,000 gallons;
PVA tank (Z011) - 14,600 gallons;
"A" system resin spray dryer (P001) tanks - 2 tanks at 1,500 gallons each;
"B" system resin spray dryer (P002) tanks - 2 tanks at 1,000 gallons each;
"C" system resin spray dryer (P003) tanks - 2 tanks at 5,000 gallons each;
MUS tanks - 2 tanks at 4,000 gallons each; and
Wet blend tank - 1,000 gallons.

(Authority for term: 40 CFR 63.1404(a))

II. Operational Restrictions

1. At all times that this emissions unit is in operation, the permittee shall operate the reactor cooling coil heat exchange system with a minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.

(Authority for term: OAC rule 3745-77-07(A)(1))

II. Operational Restrictions (continued)

2. The permittee shall establish parameter monitoring levels for the reactor batch process vent condenser based on a design evaluation or performance test, in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for small control devices. In compliance with Table 4 of 40 CFR Part 63, Subpart OOO [see Attachment 1], these parameter monitoring levels will include the maximum temperature of the gases exiting the condenser established to assure compliance with the emission reduction specified in Section A.I.2.d above.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(1)(ii))

3. Except as otherwise provided in 40 CFR Part 63 Subpart OOO [see Attachment 1], the permittee shall operate each control device such that the daily average of monitored parameters, established as specified in the paragraphs above, remains below the maximum level, as appropriate.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(4)(i))

4. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2] from all equipment, as defined under 40 CFR 63.1402 [see Attachment 1], that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1410)

5. The permittee shall identify equipment subject to the equipment leak standards, in compliance with the requirements of 40 CFR 63.1022 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1022)

6. Except as otherwise provided in 40 CFR 63.1024 [see Attachment 2], the permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair, as defined in 40 CFR 63.1024(a) [see Attachment 2], shall be made no later than 5 days after the leak is detected.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1024(a))

7. The permittee shall operate the condenser water wash system whenever this emissions unit is loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure differential on a daily basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415)

2. The permittee shall operate and maintain a low pressure alarm system which will indicate by visible and audible means that the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side has dropped below the required 35 psia minimum. If the pressure differential drops below 35 psia, the permittee shall record the beginning and ending times of the deviation, and the actions taken to alleviate the deviation.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

3. Except as otherwise provided in 40 CFR 63.1413 [see Attachment 1], the permittee shall establish parameter monitoring levels by design evaluation, or during the performance test of, the reactor batch process vent condenser.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413(a)(1)(ii))

4. Except as otherwise provided in 40 CFR 63.1415 [see Attachment 1], the permittee shall maintain and operate a reactor batch process vent condenser exit temperature monitoring device equipped with a continuous recorder. This monitoring equipment shall be in operation at all times when the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415(a), (a)(1), (b)(3))

5. Except as otherwise provided in 40 CFR 63.1416 [see Attachment 1], the permittee shall maintain records of the daily average reactor batch process vent condenser exit temperature.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(c))

6. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall maintain records of the occurrence and duration of each start-up, shutdown, or malfunction during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur, records reflecting whether the procedures specified in the affected source's start-up, shutdown, and malfunction plan were followed and documentation of actions taken that are not consistent with the plan.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

7. As provided in 40 CFR 63.1416(d) [see Attachment 1], where applicable the permittee shall maintain records of operation when monitors are not operating, operation of bypass lines, inspections and operation of the seal or closure mechanisms, and records specifying the times and duration of periods of monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(d))

8. The permittee shall comply with the requirements of 40 CFR 63.1029 [see Attachment 2]. Pumps, valves, connectors, agitators, pressure relief devices, and instrumentation systems in heavy liquid service shall be monitored.

i. If evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, the equipment shall be repaired. Repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.

ii. Within 5 days of a the detection of a potential leak, the equipment shall be monitored by instrument reading using Method 21 of 40 CFR Part 60, Appendix A, as specified in 40 CFR 63.1023 [see Attachment 2]. If an instrument reading of 10,000 parts per million or greater for agitators, 5,000 parts per million or greater for pumps handling polymerizing monomers, or 2,000 parts per million or greater for all other pumps, or 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured, a leak is detected and shall be repaired pursuant to 40 CFR 63.1024 [see Attachment 2], as applicable.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1029)

III. Monitoring and/or Record Keeping Requirements (continued)

9. For each leak detected, the information specified below shall be recorded and maintained:

i. the date of first attempt to repair the leak;

ii. the date of successful repair of the leak;

iii. the maximum instrument reading measured by Method 21 of 40 CFR Part 60, Appendix A at the time the leak is successfully repaired or determined to be nonrepairable;

iv. except as otherwise provided in 40 CFR 63.1024(f)(iv) [see Attachment 2], the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; and

v. the dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1024(f))

10. The permittee shall prepare and implement a pump quality assurance program in compliance with 40 CFR 63.1035 [see Attachment 2]. If greater than 10 percent (or three pumps) leak, on a 6-month rolling average, the permittee shall comply with the QIP requirements. Additional record keeping requirements apply while the QIP is in effect.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1035)

11. The permittee shall maintain daily records that document any time periods when the condenser water wash system was not in service when the emissions unit was loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit quarterly reports indicating any exceedances (deviations) of the pressure differential requirements (between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side), and when applicable, the information required under section A.III.2 above.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. Except as otherwise provided in 40 CFR 63.1417 [see Attachment 1], the permittee shall submit semiannual reports indicating any exceedances of the maximum allowable daily average reactor batch process vent condenser exit temperature, and when applicable, the information required under 40 CFR 63.1416(d)(3)(ii) [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1417(f))

3. The permittee shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 CFR 63.1039 [see Attachment 2], as applicable, including:

a. where any delay of repair is utilized pursuant to 40 CFR 63.1024(d) [see Attachment 2], that delay of repair has occurred and the number of instances of delay of repair;

b. if applicable, the initiation of a monthly monitoring program for valves pursuant to 40 CFR 63.1025(b)(3)(i) [see Attachment 2]; and

c. if applicable, the initiation of a quality improvement program for pumps pursuant to 40 CFR 63.1035 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1039)

IV. Reporting Requirements (continued)

4. The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the condenser water wash system was not in service when the emissions unit was loading solid feed stock. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 shall be determined in accordance with the following methods:

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:

1.8 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

1.c Emission Limitation:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR 63.1414 [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1414)

V. Testing Requirements (continued)

2. The permittee shall conduct a design evaluation for the reactor batch process vent condenser in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for a small control device. In compliance with 40 CFR 63.1413(a)(3) the design evaluation shall consider the composition and organic HAP concentration of the vent stream, vent stream flow rate, relative humidity, and temperature and shall establish the operating parameters of the control device, design outlet organic HAP compound concentration level, design average temperature of the condenser exhaust vent stream, and the design average temperatures of the coolant fluid at the condenser inlet and outlet. The temperature of the gas stream exiting the condenser shall be measured and used to establish the outlet organic HAP concentration. The permittee may elect as an alternate to conduct a performance test for a small control device and such a performance test shall follow the procedures specified in 40 CFR 63.1413, as appropriate. The parameter monitoring levels for the reactor batch process vent condenser shall be set based on this design evaluation or performance test.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413)

VI. Miscellaneous Requirements

1. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall develop and implement a start-up, shutdown, and malfunction plan as specified in 40 CFR 63.6(e)(3) [see Attachment 3 and Table 1 in Attachment 1]. As specified in 40 CFR 63.1416(b)(1) [see Attachment 1], this plan shall require the permittee to maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment, or control devices, or recovery devices, or continuous monitoring systems, or control technologies used to comply with Subpart OOO during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur. The requirements of 40 CFR 63.1400(k)(1) through (4) [see Attachment 1], shall be met during periods of start-up, shutdown, malfunction, or non-operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Reactor #1 (P008)

Activity Description: One of four reactor kettles used to produce liquid formaldehyde resins.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
amino/phenolic resin processing unit, general provisions	OAC rule 3745-21-07(G)(2)	See section A.I.2.a.
	40 CFR Part 63, Subpart A	See section A.I.2.b.
	40 CFR Part 63, Subpart OOO	See section A.I.2.c.
reactor batch process vent controlled by a condenser with spray wash system	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	1.8 lbs/hr of particulate emissions
	40 CFR Part 63, Subpart OOO	See section A.I.2.d.
heat exchange systems	40 CFR Part 63, Subpart OOO	See section A.I.2.e.
equipment leaks, controlled by equipment design and operating and maintenance programs	40 CFR Part 63, Subpart OOO	See section A.I.2.f.
storage vessels	40 CFR Part 63, Subpart OOO	See section A.I.2.g.

2. Additional Terms and Conditions

2.a This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

2.b i. 40 CFR Part 63, Subpart A [see Attachment 3] provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 63.

ii. Table 1 of 40 CFR Part 63, Subpart OOO [see Attachment 1] specifies the provisions of 40 CFR Part 63, Subpart A that apply and those provisions that do not apply.

(Authority for term: 40 CFR 63.1400(j))

2. Additional Terms and Conditions (continued)

2.c The provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1] apply to processes that produce amino/phenolic resins and that are located at a plant site that is a major source. This emissions unit is utilized to produce amino/phenolic resins at the BTLSR Toledo plant site, which is a major source of the hazardous air pollutant (HAP) formaldehyde. This emissions unit is therefore subject to the provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1].

(Authority for term: 40 CFR 63.1400(a))

2.d Except as otherwise provided in 40 CFR 63.1406 [see Attachment 1], the permittee shall control organic HAP emissions from the reactor batch process vent by complying with either of the following:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

(Authority for term: 40 CFR 63.1406(a)(2))

2.e There are no applicable requirements for existing heat exchangers (cooling coils) with a minimum cooling water pressure more than 35 kilopascals greater than the maximum process side pressure.

(Authority for term: 40 CFR 63.1409(a)(1))

2.f Except as otherwise provided in 40 CFR Part 63, Subpart OOO [see Attachment 1], the permittee shall establish a leak detection and repair program which complies with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2]. These requirements are described in 40 CFR 63.1029 [see Attachment 2] and 63.1410 [see Attachment 1]. These requirements apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.

(Authority for term: 40 CFR 63.1410)

2.g There are no applicable requirements for existing storage vessels with a capacity of less than 50,000 gallons. The existing storage vessels include the following:

formaldehyde tank (Z009) - 14,600 gallons;
fuel oil tank (Z010) - 10,000 gallons;
PVA tank (Z011) - 14,600 gallons;
"A" system resin spray dryer (P001) tanks - 2 tanks at 1,500 gallons each;
"B" system resin spray dryer (P002) tanks - 2 tanks at 1,000 gallons each;
"C" system resin spray dryer (P003) tanks - 2 tanks at 5,000 gallons each;
MUS tanks - 2 tanks at 4,000 gallons each; and
Wet blend tank - 1,000 gallons.

(Authority for term: 40 CFR 63.1404(a))

II. Operational Restrictions

1. At all times that this emissions unit is in operation, the permittee shall operate the reactor cooling coil heat exchange system with a minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.

(Authority for term: OAC rule 3745-77-07(A)(1))

II. Operational Restrictions (continued)

2. The permittee shall establish parameter monitoring levels for the reactor batch process vent condenser based on a design evaluation or performance test, in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for small control devices. In compliance with Table 4 of 40 CFR Part 63, Subpart OOO [see Attachment 1], these parameter monitoring levels will include the maximum temperature of the gases exiting the condenser established to assure compliance with the emission reduction specified in Section A.I.2.d above.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(1)(ii))

3. Except as otherwise provided in 40 CFR Part 63 Subpart OOO [see Attachment 1], the permittee shall operate each control device such that the daily average of monitored parameters, established as specified in the paragraphs above, remains below the maximum level, as appropriate.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(4)(i))

4. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2] from all equipment, as defined under 40 CFR 63.1402 [see Attachment 1], that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1410)

5. The permittee shall identify equipment subject to the equipment leak standards, in compliance with the requirements of 40 CFR 63.1022 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1022)

6. Except as otherwise provided in 40 CFR 63.1024 [see Attachment 2], the permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair, as defined in 40 CFR 63.1024(a) [see Attachment 2], shall be made no later than 5 days after the leak is detected.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1024(a))

7. The permittee shall operate the condenser water wash system whenever this emissions unit is loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure differential on a daily basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415)

2. The permittee shall operate and maintain a low pressure alarm system which will indicate by visible and audible means that the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side has dropped below the required 35 psia minimum. If the pressure differential drops below 35 psia, the permittee shall record the beginning and ending times of the deviation, and the actions taken to alleviate the deviation.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

3. Except as otherwise provided in 40 CFR 63.1413 [see Attachment 1], the permittee shall establish parameter monitoring levels by design evaluation, or during the performance test of, the reactor batch process vent condenser.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413(a)(1)(ii))

4. Except as otherwise provided in 40 CFR 63.1415 [see Attachment 1], the permittee shall maintain and operate a reactor batch process vent condenser exit temperature monitoring device equipped with a continuous recorder. This monitoring equipment shall be in operation at all times when the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415(a), (a)(1), (b)(3))

5. Except as otherwise provided in 40 CFR 63.1416 [see Attachment 1], the permittee shall maintain records of the daily average reactor batch process vent condenser exit temperature.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(c))

6. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall maintain records of the occurrence and duration of each start-up, shutdown, or malfunction during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur, records reflecting whether the procedures specified in the affected source's start-up, shutdown, and malfunction plan were followed and documentation of actions taken that are not consistent with the plan.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

7. As provided in 40 CFR 63.1416(d) [see Attachment 1], where applicable the permittee shall maintain records of operation when monitors are not operating, operation of bypass lines, inspections and operation of the seal or closure mechanisms, and records specifying the times and duration of periods of monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(d))

8. The permittee shall comply with the requirements of 40 CFR 63.1029 [see Attachment 2]. Pumps, valves, connectors, agitators, pressure relief devices, and instrumentation systems in heavy liquid service shall be monitored.

i. If evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, the equipment shall be repaired. Repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.

ii. Within 5 days of a the detection of a potential leak, the equipment shall be monitored by instrument reading using Method 21 of 40 CFR Part 60, Appendix A, as specified in 40 CFR 63.1023 [see Attachment 2]. If an instrument reading of 10,000 parts per million or greater for agitators, 5,000 parts per million or greater for pumps handling polymerizing monomers, or 2,000 parts per million or greater for all other pumps, or 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured, a leak is detected and shall be repaired pursuant to 40 CFR 63.1024 [see Attachment 2], as applicable.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1029)

III. Monitoring and/or Record Keeping Requirements (continued)

9. For each leak detected, the information specified below shall be recorded and maintained:

i. the date of first attempt to repair the leak;

ii. the date of successful repair of the leak;

iii. the maximum instrument reading measured by Method 21 of 40 CFR Part 60, Appendix A at the time the leak is successfully repaired or determined to be nonrepairable;

iv. except as otherwise provided in 40 CFR 63.1024(f)(iv) [see Attachment 2], the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; and

v. the dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1024(f))

10. The permittee shall prepare and implement a pump quality assurance program in compliance with 40 CFR 63.1035 [see Attachment 2]. If greater than 10 percent (or three pumps) leak, on a 6-month rolling average, the permittee shall comply with the QIP requirements. Additional record keeping requirements apply while the QIP is in effect.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1035)

11. The permittee shall maintain daily records that document any time periods when the condenser water wash system was not in service when the emissions unit was loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit quarterly reports indicating any exceedances (deviations) of the pressure differential requirements (between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side), and when applicable, the information required under section A.III.2 above.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. Except as otherwise provided in 40 CFR 63.1417 [see Attachment 1], the permittee shall submit semiannual reports indicating any exceedances of the maximum allowable daily average reactor batch process vent condenser exit temperature, and when applicable, the information required under 40 CFR 63.1416(d)(3)(ii) [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1417(f))

3. The permittee shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 CFR 63.1039 [see Attachment 2], as applicable, including:

a. where any delay of repair is utilized pursuant to 40 CFR 63.1024(d) [see Attachment 2], that delay of repair has occurred and the number of instances of delay of repair;

b. if applicable, the initiation of a monthly monitoring program for valves pursuant to 40 CFR 63.1025(b)(3)(i) [see Attachment 2]; and

c. if applicable, the initiation of a quality improvement program for pumps pursuant to 40 CFR 63.1035 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1039)

IV. Reporting Requirements (continued)

4. The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the condenser water wash system was not in service when the emissions unit was loading solid feed stock. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 shall be determined in accordance with the following methods:

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:

1.8 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

1.c Emission Limitation:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR 63.1414 [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1414)

V. Testing Requirements (continued)

2. The permittee shall conduct a design evaluation for the reactor batch process vent condenser in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for a small control device. In compliance with 40 CFR 63.1413(a)(3) the design evaluation shall consider the composition and organic HAP concentration of the vent stream, vent stream flow rate, relative humidity, and temperature and shall establish the operating parameters of the control device, design outlet organic HAP compound concentration level, design average temperature of the condenser exhaust vent stream, and the design average temperatures of the coolant fluid at the condenser inlet and outlet. The temperature of the gas stream exiting the condenser shall be measured and used to establish the outlet organic HAP concentration. The permittee may elect as an alternate to conduct a performance test for a small control device and such a performance test shall follow the procedures specified in 40 CFR 63.1413, as appropriate. The parameter monitoring levels for the reactor batch process vent condenser shall be set based on this design evaluation or performance test.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413)

VI. Miscellaneous Requirements

1. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall develop and implement a start-up, shutdown, and malfunction plan as specified in 40 CFR 63.6(e)(3) [see Attachment 3 and Table 1 in Attachment 1]. As specified in 40 CFR 63.1416(b)(1) [see Attachment 1], this plan shall require the permittee to maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment, or control devices, or recovery devices, or continuous monitoring systems, or control technologies used to comply with Subpart OOO during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur. The requirements of 40 CFR 63.1400(k)(1) through (4) [see Attachment 1], shall be met during periods of start-up, shutdown, malfunction, or non-operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Reactor #2 (P009)

Activity Description: One of four reactor kettles used to produce liquid formaldehyde resins.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
amino/phenolic resin processing unit, general provisions	OAC rule 3745-21-07(G)(2)	See section A.I.2.a.
	40 CFR Part 63, Subpart A	See section A.I.2.b.
	40 CFR Part 63, Subpart OOO	See section A.I.2.c.
reactor batch process vent controlled by a condenser with spray wash system	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	1.8 lbs/hr of particulate emissions
	40 CFR Part 63, Subpart OOO	See section A.I.2.d.
heat exchange systems	40 CFR Part 63, Subpart OOO	See section A.I.2.e.
equipment leaks, controlled by equipment design and operating and maintenance programs	40 CFR Part 63, Subpart OOO	See section A.I.2.f.
storage vessels	40 CFR Part 63, Subpart OOO	See section A.I.2.g.

2. Additional Terms and Conditions

2.a This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

2.b i. 40 CFR Part 63, Subpart A [see Attachment 3] provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 63.

ii. Table 1 of 40 CFR Part 63, Subpart OOO [see Attachment 1] specifies the provisions of 40 CFR Part 63, Subpart A that apply and those provisions that do not apply.

(Authority for term: 40 CFR 63.1400(j))

2. Additional Terms and Conditions (continued)

2.c The provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1] apply to processes that produce amino/phenolic resins and that are located at a plant site that is a major source. This emissions unit is utilized to produce amino/phenolic resins at the BTLSR Toledo plant site, which is a major source of the hazardous air pollutant (HAP) formaldehyde. This emissions unit is therefore subject to the provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1].

(Authority for term: 40 CFR 63.1400(a))

2.d Except as otherwise provided in 40 CFR 63.1406 [see Attachment 1], the permittee shall control organic HAP emissions from the reactor batch process vent by complying with either of the following:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

(Authority for term: 40 CFR 63.1406(a)(2))

2.e There are no applicable requirements for existing heat exchangers (cooling coils) with a minimum cooling water pressure more than 35 kilopascals greater than the maximum process side pressure.

(Authority for term: 40 CFR 63.1409(a)(1))

2.f Except as otherwise provided in 40 CFR Part 63, Subpart OOO [see Attachment 1], the permittee shall establish a leak detection and repair program which complies with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2]. These requirements are described in 40 CFR 63.1029 [see Attachment 2] and 63.1410 [see Attachment 1]. These requirements apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.

(Authority for term: 40 CFR 63.1410)

2.g There are no applicable requirements for existing storage vessels with a capacity of less than 50,000 gallons. The existing storage vessels include the following:

formaldehyde tank (Z009) - 14,600 gallons;
fuel oil tank (Z010) - 10,000 gallons;
PVA tank (Z011) - 14,600 gallons;
"A" system resin spray dryer (P001) tanks - 2 tanks at 1,500 gallons each;
"B" system resin spray dryer (P002) tanks - 2 tanks at 1,000 gallons each;
"C" system resin spray dryer (P003) tanks - 2 tanks at 5,000 gallons each;
MUS tanks - 2 tanks at 4,000 gallons each; and
Wet blend tank - 1,000 gallons.

(Authority for term: 40 CFR 63.1404(a))

II. Operational Restrictions

1. At all times that this emissions unit is in operation, the permittee shall operate the reactor cooling coil heat exchange system with a minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.

(Authority for term: OAC rule 3745-77-07(A)(1))

II. Operational Restrictions (continued)

2. The permittee shall establish parameter monitoring levels for the reactor batch process vent condenser based on a design evaluation or performance test, in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for small control devices. In compliance with Table 4 of 40 CFR Part 63, Subpart OOO [see Attachment 1], these parameter monitoring levels will include the maximum temperature of the gases exiting the condenser established to assure compliance with the emission reduction specified in Section A.I.2.d above.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(1)(ii))

3. Except as otherwise provided in 40 CFR Part 63 Subpart OOO [see Attachment 1], the permittee shall operate each control device such that the daily average of monitored parameters, established as specified in the paragraphs above, remains below the maximum level, as appropriate.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(4)(i))

4. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2] from all equipment, as defined under 40 CFR 63.1402 [see Attachment 1], that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1410)

5. The permittee shall identify equipment subject to the equipment leak standards, in compliance with the requirements of 40 CFR 63.1022 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1022)

6. Except as otherwise provided in 40 CFR 63.1024 [see Attachment 2], the permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair, as defined in 40 CFR 63.1024(a) [see Attachment 2], shall be made no later than 5 days after the leak is detected.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1024(a))

7. The permittee shall operate the condenser water wash system whenever this emissions unit is loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure differential on a daily basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415)

2. The permittee shall operate and maintain a low pressure alarm system which will indicate by visible and audible means that the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side has dropped below the required 35 psia minimum. If the pressure differential drops below 35 psia, the permittee shall record the beginning and ending times of the deviation, and the actions taken to alleviate the deviation.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

3. Except as otherwise provided in 40 CFR 63.1413 [see Attachment 1], the permittee shall establish parameter monitoring levels by design evaluation, or during the performance test of, the reactor batch process vent condenser.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413(a)(1)(ii))

4. Except as otherwise provided in 40 CFR 63.1415 [see Attachment 1], the permittee shall maintain and operate a reactor batch process vent condenser exit temperature monitoring device equipped with a continuous recorder. This monitoring equipment shall be in operation at all times when the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415(a), (a)(1), (b)(3))

5. Except as otherwise provided in 40 CFR 63.1416 [see Attachment 1], the permittee shall maintain records of the daily average reactor batch process vent condenser exit temperature.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(c))

6. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall maintain records of the occurrence and duration of each start-up, shutdown, or malfunction during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur, records reflecting whether the procedures specified in the affected source's start-up, shutdown, and malfunction plan were followed and documentation of actions taken that are not consistent with the plan.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

7. As provided in 40 CFR 63.1416(d) [see Attachment 1], where applicable the permittee shall maintain records of operation when monitors are not operating, operation of bypass lines, inspections and operation of the seal or closure mechanisms, and records specifying the times and duration of periods of monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(d))

8. The permittee shall comply with the requirements of 40 CFR 63.1029 [see Attachment 2]. Pumps, valves, connectors, agitators, pressure relief devices, and instrumentation systems in heavy liquid service shall be monitored.

i. If evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, the equipment shall be repaired. Repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.

ii. Within 5 days of a the detection of a potential leak, the equipment shall be monitored by instrument reading using Method 21 of 40 CFR Part 60, Appendix A, as specified in 40 CFR 63.1023 [see Attachment 2]. If an instrument reading of 10,000 parts per million or greater for agitators, 5,000 parts per million or greater for pumps handling polymerizing monomers, or 2,000 parts per million or greater for all other pumps, or 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured, a leak is detected and shall be repaired pursuant to 40 CFR 63.1024 [see Attachment 2], as applicable.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1029)

III. Monitoring and/or Record Keeping Requirements (continued)

9. For each leak detected, the information specified below shall be recorded and maintained:

i. the date of first attempt to repair the leak;

ii. the date of successful repair of the leak;

iii. the maximum instrument reading measured by Method 21 of 40 CFR Part 60, Appendix A at the time the leak is successfully repaired or determined to be nonrepairable;

iv. except as otherwise provided in 40 CFR 63.1024(f)(iv) [see Attachment 2], the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; and

v. the dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1024(f))

10. The permittee shall prepare and implement a pump quality assurance program in compliance with 40 CFR 63.1035 [see Attachment 2]. If greater than 10 percent (or three pumps) leak, on a 6-month rolling average, the permittee shall comply with the QIP requirements. Additional record keeping requirements apply while the QIP is in effect.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1035)

11. The permittee shall maintain daily records that document any time periods when the condenser water wash system was not in service when the emissions unit was loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit quarterly reports indicating any exceedances (deviations) of the pressure differential requirements (between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side), and when applicable, the information required under section A.III.2 above.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. Except as otherwise provided in 40 CFR 63.1417 [see Attachment 1], the permittee shall submit semiannual reports indicating any exceedances of the maximum allowable daily average reactor batch process vent condenser exit temperature, and when applicable, the information required under 40 CFR 63.1416(d)(3)(ii) [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1417(f))

3. The permittee shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 CFR 63.1039 [see Attachment 2], as applicable, including:

a. where any delay of repair is utilized pursuant to 40 CFR 63.1024(d) [see Attachment 2], that delay of repair has occurred and the number of instances of delay of repair;

b. if applicable, the initiation of a monthly monitoring program for valves pursuant to 40 CFR 63.1025(b)(3)(i) [see Attachment 2]; and

c. if applicable, the initiation of a quality improvement program for pumps pursuant to 40 CFR 63.1035 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1039)

IV. Reporting Requirements (continued)

4. The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the condenser water wash system was not in service when the emissions unit was loading solid feed stock. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 shall be determined in accordance with the following methods:

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:

1.8 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

1.c Emission Limitation:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR 63.1414 [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1414)

V. Testing Requirements (continued)

2. The permittee shall conduct a design evaluation for the reactor batch process vent condenser in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for a small control device. In compliance with 40 CFR 63.1413(a)(3) the design evaluation shall consider the composition and organic HAP concentration of the vent stream, vent stream flow rate, relative humidity, and temperature and shall establish the operating parameters of the control device, design outlet organic HAP compound concentration level, design average temperature of the condenser exhaust vent stream, and the design average temperatures of the coolant fluid at the condenser inlet and outlet. The temperature of the gas stream exiting the condenser shall be measured and used to establish the outlet organic HAP concentration. The permittee may elect as an alternate to conduct a performance test for a small control device and such a performance test shall follow the procedures specified in 40 CFR 63.1413, as appropriate. The parameter monitoring levels for the reactor batch process vent condenser shall be set based on this design evaluation or performance test.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413)

VI. Miscellaneous Requirements

1. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall develop and implement a start-up, shutdown, and malfunction plan as specified in 40 CFR 63.6(e)(3) [see Attachment 3 and Table 1 in Attachment 1]. As specified in 40 CFR 63.1416(b)(1) [see Attachment 1], this plan shall require the permittee to maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment, or control devices, or recovery devices, or continuous monitoring systems, or control technologies used to comply with Subpart OOO during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur. The requirements of 40 CFR 63.1400(k)(1) through (4) [see Attachment 1], shall be met during periods of start-up, shutdown, malfunction, or non-operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Reactor #3 (P010)

Activity Description: One of four reactor kettles used to produce liquid formaldehyde resins.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
amino/phenolic resin processing unit, general provisions	OAC rule 3745-21-07(G)(2)	See section A.I.2.a.
	40 CFR Part 63, Subpart A	See section A.I.2.b.
	40 CFR Part 63, Subpart OOO	See section A.I.2.c.
reactor batch process vent controlled by a condenser with spray wash system	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	1.8 lbs/hr of particulate emissions
	40 CFR Part 63, Subpart OOO	See section A.I.2.d.
heat exchange systems	40 CFR Part 63, Subpart OOO	See section A.I.2.e.
equipment leaks, controlled by equipment design and operating and maintenance programs	40 CFR Part 63, Subpart OOO	See section A.I.2.f.
storage vessels	40 CFR Part 63, Subpart OOO	See section A.I.2.g.

2. Additional Terms and Conditions

2.a This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

2.b i. 40 CFR Part 63, Subpart A [see Attachment 3] provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 63.

ii. Table 1 of 40 CFR Part 63, Subpart OOO [see Attachment 1] specifies the provisions of 40 CFR Part 63, Subpart A that apply and those provisions that do not apply.

(Authority for term: 40 CFR 63.1400(j))

2. Additional Terms and Conditions (continued)

2.c The provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1] apply to processes that produce amino/phenolic resins and that are located at a plant site that is a major source. This emissions unit is utilized to produce amino/phenolic resins at the BTLSR Toledo plant site, which is a major source of the hazardous air pollutant (HAP) formaldehyde. This emissions unit is therefore subject to the provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1].

(Authority for term: 40 CFR 63.1400(a))

2.d Except as otherwise provided in 40 CFR 63.1406 [see Attachment 1], the permittee shall control organic HAP emissions from the reactor batch process vent by complying with either of the following:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

(Authority for term: 40 CFR 63.1406(a)(2))

2.e There are no applicable requirements for existing heat exchangers (cooling coils) with a minimum cooling water pressure more than 35 kilopascals greater than the maximum process side pressure.

(Authority for term: 40 CFR 63.1409(a)(1))

2.f Except as otherwise provided in 40 CFR Part 63, Subpart OOO [see Attachment 1], the permittee shall establish a leak detection and repair program which complies with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2]. These requirements are described in 40 CFR 63.1029 [see Attachment 2] and 63.1410 [see Attachment 1]. These requirements apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.

(Authority for term: 40 CFR 63.1410)

2.g There are no applicable requirements for existing storage vessels with a capacity of less than 50,000 gallons. The existing storage vessels include the following:

formaldehyde tank (Z009) - 14,600 gallons;
fuel oil tank (Z010) - 10,000 gallons;
PVA tank (Z011) - 14,600 gallons;
"A" system resin spray dryer (P001) tanks - 2 tanks at 1,500 gallons each;
"B" system resin spray dryer (P002) tanks - 2 tanks at 1,000 gallons each;
"C" system resin spray dryer (P003) tanks - 2 tanks at 5,000 gallons each;
MUS tanks - 2 tanks at 4,000 gallons each; and
Wet blend tank - 1,000 gallons.

(Authority for term: 40 CFR 63.1404(a))

II. Operational Restrictions

1. At all times that this emissions unit is in operation, the permittee shall operate the reactor cooling coil heat exchange system with a minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.

(Authority for term: OAC rule 3745-77-07(A)(1))

II. Operational Restrictions (continued)

2. The permittee shall establish parameter monitoring levels for the reactor batch process vent condenser based on a design evaluation or performance test, in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for small control devices. In compliance with Table 4 of 40 CFR Part 63, Subpart OOO [see Attachment 1], these parameter monitoring levels will include the maximum temperature of the gases exiting the condenser established to assure compliance with the emission reduction specified in Section A.I.2.d above.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(1)(ii))

3. Except as otherwise provided in 40 CFR Part 63 Subpart OOO [see Attachment 1], the permittee shall operate each control device such that the daily average of monitored parameters, established as specified in the paragraphs above, remains below the maximum level, as appropriate.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(4)(i))

4. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2] from all equipment, as defined under 40 CFR 63.1402 [see Attachment 1], that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1410)

5. The permittee shall identify equipment subject to the equipment leak standards, in compliance with the requirements of 40 CFR 63.1022 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1022)

6. Except as otherwise provided in 40 CFR 63.1024 [see Attachment 2], the permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair, as defined in 40 CFR 63.1024(a) [see Attachment 2], shall be made no later than 5 days after the leak is detected.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1024(a))

7. The permittee shall operate the condenser water wash system whenever this emissions unit is loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure differential on a daily basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415)

2. The permittee shall operate and maintain a low pressure alarm system which will indicate by visible and audible means that the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side has dropped below the required 35 psia minimum. If the pressure differential drops below 35 psia, the permittee shall record the beginning and ending times of the deviation, and the actions taken to alleviate the deviation.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

3. Except as otherwise provided in 40 CFR 63.1413 [see Attachment 1], the permittee shall establish parameter monitoring levels by design evaluation, or during the performance test of, the reactor batch process vent condenser.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413(a)(1)(ii))

4. Except as otherwise provided in 40 CFR 63.1415 [see Attachment 1], the permittee shall maintain and operate a reactor batch process vent condenser exit temperature monitoring device equipped with a continuous recorder. This monitoring equipment shall be in operation at all times when the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415(a), (a)(1), (b)(3))

5. Except as otherwise provided in 40 CFR 63.1416 [see Attachment 1], the permittee shall maintain records of the daily average reactor batch process vent condenser exit temperature.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(c))

6. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall maintain records of the occurrence and duration of each start-up, shutdown, or malfunction during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur, records reflecting whether the procedures specified in the affected source's start-up, shutdown, and malfunction plan were followed and documentation of actions taken that are not consistent with the plan.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

7. As provided in 40 CFR 63.1416(d) [see Attachment 1], where applicable the permittee shall maintain records of operation when monitors are not operating, operation of bypass lines, inspections and operation of the seal or closure mechanisms, and records specifying the times and duration of periods of monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(d))

8. The permittee shall comply with the requirements of 40 CFR 63.1029 [see Attachment 2]. Pumps, valves, connectors, agitators, pressure relief devices, and instrumentation systems in heavy liquid service shall be monitored.

i. If evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, the equipment shall be repaired. Repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.

ii. Within 5 days of a the detection of a potential leak, the equipment shall be monitored by instrument reading using Method 21 of 40 CFR Part 60, Appendix A, as specified in 40 CFR 63.1023 [see Attachment 2]. If an instrument reading of 10,000 parts per million or greater for agitators, 5,000 parts per million or greater for pumps handling polymerizing monomers, or 2,000 parts per million or greater for all other pumps, or 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured, a leak is detected and shall be repaired pursuant to 40 CFR 63.1024 [see Attachment 2], as applicable.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1029)

III. Monitoring and/or Record Keeping Requirements (continued)

9. For each leak detected, the information specified below shall be recorded and maintained:

i. the date of first attempt to repair the leak;

ii. the date of successful repair of the leak;

iii. the maximum instrument reading measured by Method 21 of 40 CFR Part 60, Appendix A at the time the leak is successfully repaired or determined to be nonrepairable;

iv. except as otherwise provided in 40 CFR 63.1024(f)(iv) [see Attachment 2], the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; and

v. the dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1024(f))

10. The permittee shall prepare and implement a pump quality assurance program in compliance with 40 CFR 63.1035 [see Attachment 2]. If greater than 10 percent (or three pumps) leak, on a 6-month rolling average, the permittee shall comply with the QIP requirements. Additional record keeping requirements apply while the QIP is in effect.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1035)

11. The permittee shall maintain daily records that document any time periods when the condenser water wash system was not in service when the emissions unit was loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit quarterly reports indicating any exceedances (deviations) of the pressure differential requirements (between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side), and when applicable, the information required under section A.III.2 above.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. Except as otherwise provided in 40 CFR 63.1417 [see Attachment 1], the permittee shall submit semiannual reports indicating any exceedances of the maximum allowable daily average reactor batch process vent condenser exit temperature, and when applicable, the information required under 40 CFR 63.1416(d)(3)(ii) [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1417(f))

3. The permittee shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 CFR 63.1039 [see Attachment 2], as applicable, including:

a. where any delay of repair is utilized pursuant to 40 CFR 63.1024(d) [see Attachment 2], that delay of repair has occurred and the number of instances of delay of repair;

b. if applicable, the initiation of a monthly monitoring program for valves pursuant to 40 CFR 63.1025(b)(3)(i) [see Attachment 2]; and

c. if applicable, the initiation of a quality improvement program for pumps pursuant to 40 CFR 63.1035 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1039)

IV. Reporting Requirements (continued)

4. The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the condenser water wash system was not in service when the emissions unit was loading solid feed stock. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 shall be determined in accordance with the following methods:

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:

1.8 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

1.c Emission Limitation:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR 63.1414 [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1414)

V. Testing Requirements (continued)

2. The permittee shall conduct a design evaluation for the reactor batch process vent condenser in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for a small control device. In compliance with 40 CFR 63.1413(a)(3) the design evaluation shall consider the composition and organic HAP concentration of the vent stream, vent stream flow rate, relative humidity, and temperature and shall establish the operating parameters of the control device, design outlet organic HAP compound concentration level, design average temperature of the condenser exhaust vent stream, and the design average temperatures of the coolant fluid at the condenser inlet and outlet. The temperature of the gas stream exiting the condenser shall be measured and used to establish the outlet organic HAP concentration. The permittee may elect as an alternate to conduct a performance test for a small control device and such a performance test shall follow the procedures specified in 40 CFR 63.1413, as appropriate. The parameter monitoring levels for the reactor batch process vent condenser shall be set based on this design evaluation or performance test.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413)

VI. Miscellaneous Requirements

1. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall develop and implement a start-up, shutdown, and malfunction plan as specified in 40 CFR 63.6(e)(3) [see Attachment 3 and Table 1 in Attachment 1]. As specified in 40 CFR 63.1416(b)(1) [see Attachment 1], this plan shall require the permittee to maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment, or control devices, or recovery devices, or continuous monitoring systems, or control technologies used to comply with Subpart OOO during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur. The requirements of 40 CFR 63.1400(k)(1) through (4) [see Attachment 1], shall be met during periods of start-up, shutdown, malfunction, or non-operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Reactor #4 (P011)

Activity Description: One of four reactor kettles used to produce liquid formaldehyde resins.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
amino/phenolic resin processing unit, general provisions	OAC rule 3745-21-07(G)(2)	See section A.I.2.a.
	40 CFR Part 63, Subpart A	See section A.I.2.b.
	40 CFR Part 63, Subpart OOO	See section A.I.2.c.
reactor batch process vent controlled by a condenser with spray wash system	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	1.8 lbs/hr of particulate emissions
	40 CFR Part 63, Subpart OOO	See section A.I.2.d.
heat exchange systems	40 CFR Part 63, Subpart OOO	See section A.I.2.e.
equipment leaks, controlled by equipment design and operating and maintenance programs	40 CFR Part 63, Subpart OOO	See section A.I.2.f.
storage vessels	40 CFR Part 63, Subpart OOO	See section A.I.2.g.

2. Additional Terms and Conditions

2.a This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

2.b i. 40 CFR Part 63, Subpart A [see Attachment 3] provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 63.

ii. Table 1 of 40 CFR Part 63, Subpart OOO [see Attachment 1] specifies the provisions of 40 CFR Part 63, Subpart A that apply and those provisions that do not apply.

(Authority for term: 40 CFR 63.1400(j))

2. Additional Terms and Conditions (continued)

2.c The provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1] apply to processes that produce amino/phenolic resins and that are located at a plant site that is a major source. This emissions unit is utilized to produce amino/phenolic resins at the BTLSR Toledo plant site, which is a major source of the hazardous air pollutant (HAP) formaldehyde. This emissions unit is therefore subject to the provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1].

(Authority for term: 40 CFR 63.1400(a))

2.d Except as otherwise provided in 40 CFR 63.1406 [see Attachment 1], the permittee shall control organic HAP emissions from the reactor batch process vent by complying with either of the following:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

(Authority for term: 40 CFR 63.1406(a)(2))

2.e There are no applicable requirements for existing heat exchangers (cooling coils) with a minimum cooling water pressure more than 35 kilopascals greater than the maximum process side pressure.

(Authority for term: 40 CFR 63.1409(a)(1))

2.f Except as otherwise provided in 40 CFR Part 63, Subpart OOO [see Attachment 1], the permittee shall establish a leak detection and repair program which complies with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2]. These requirements are described in 40 CFR 63.1029 [see Attachment 2] and 63.1410 [see Attachment 1]. These requirements apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.

(Authority for term: 40 CFR 63.1410)

2.g There are no applicable requirements for existing storage vessels with a capacity of less than 50,000 gallons. The existing storage vessels include the following:

formaldehyde tank (Z009) - 14,600 gallons;
fuel oil tank (Z010) - 10,000 gallons;
PVA tank (Z011) - 14,600 gallons;
"A" system resin spray dryer (P001) tanks - 2 tanks at 1,500 gallons each;
"B" system resin spray dryer (P002) tanks - 2 tanks at 1,000 gallons each;
"C" system resin spray dryer (P003) tanks - 2 tanks at 5,000 gallons each;
MUS tanks - 2 tanks at 4,000 gallons each; and
Wet blend tank - 1,000 gallons.

(Authority for term: 40 CFR 63.1404(a))

II. Operational Restrictions

1. At all times that this emissions unit is in operation, the permittee shall operate the reactor cooling coil heat exchange system with a minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.

(Authority for term: OAC rule 3745-77-07(A)(1))

II. Operational Restrictions (continued)

2. The permittee shall establish parameter monitoring levels for the reactor batch process vent condenser based on a design evaluation or performance test, in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for small control devices. In compliance with Table 4 of 40 CFR Part 63, Subpart OOO [see Attachment 1], these parameter monitoring levels will include the maximum temperature of the gases exiting the condenser established to assure compliance with the emission reduction specified in Section A.I.2.d above.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(1)(ii))

3. Except as otherwise provided in 40 CFR Part 63 Subpart OOO [see Attachment 1], the permittee shall operate each control device such that the daily average of monitored parameters, established as specified in the paragraphs above, remains below the maximum level, as appropriate.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(4)(i))

4. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2] from all equipment, as defined under 40 CFR 63.1402 [see Attachment 1], that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1410)

5. The permittee shall identify equipment subject to the equipment leak standards, in compliance with the requirements of 40 CFR 63.1022 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1022)

6. Except as otherwise provided in 40 CFR 63.1024 [see Attachment 2], the permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair, as defined in 40 CFR 63.1024(a) [see Attachment 2], shall be made no later than 5 days after the leak is detected.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1024(a))

7. The permittee shall operate the condenser water wash system whenever this emissions unit is loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure differential on a daily basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415)

2. The permittee shall operate and maintain a low pressure alarm system which will indicate by visible and audible means that the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side has dropped below the required 35 psia minimum. If the pressure differential drops below 35 psia, the permittee shall record the beginning and ending times of the deviation, and the actions taken to alleviate the deviation.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

3. Except as otherwise provided in 40 CFR 63.1413 [see Attachment 1], the permittee shall establish parameter monitoring levels by design evaluation, or during the performance test of, the reactor batch process vent condenser.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413(a)(1)(ii))

4. Except as otherwise provided in 40 CFR 63.1415 [see Attachment 1], the permittee shall maintain and operate a reactor batch process vent condenser exit temperature monitoring device equipped with a continuous recorder. This monitoring equipment shall be in operation at all times when the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415(a), (a)(1), (b)(3))

5. Except as otherwise provided in 40 CFR 63.1416 [see Attachment 1], the permittee shall maintain records of the daily average reactor batch process vent condenser exit temperature.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(c))

6. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall maintain records of the occurrence and duration of each start-up, shutdown, or malfunction during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur, records reflecting whether the procedures specified in the affected source's start-up, shutdown, and malfunction plan were followed and documentation of actions taken that are not consistent with the plan.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

7. As provided in 40 CFR 63.1416(d) [see Attachment 1], where applicable the permittee shall maintain records of operation when monitors are not operating, operation of bypass lines, inspections and operation of the seal or closure mechanisms, and records specifying the times and duration of periods of monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(d))

8. The permittee shall comply with the requirements of 40 CFR 63.1029 [see Attachment 2]. Pumps, valves, connectors, agitators, pressure relief devices, and instrumentation systems in heavy liquid service shall be monitored.

i. If evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, the equipment shall be repaired. Repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.

ii. Within 5 days of a the detection of a potential leak, the equipment shall be monitored by instrument reading using Method 21 of 40 CFR Part 60, Appendix A, as specified in 40 CFR 63.1023 [see Attachment 2]. If an instrument reading of 10,000 parts per million or greater for agitators, 5,000 parts per million or greater for pumps handling polymerizing monomers, or 2,000 parts per million or greater for all other pumps, or 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured, a leak is detected and shall be repaired pursuant to 40 CFR 63.1024 [see Attachment 2], as applicable.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1029)

III. Monitoring and/or Record Keeping Requirements (continued)

9. For each leak detected, the information specified below shall be recorded and maintained:

i. the date of first attempt to repair the leak;

ii. the date of successful repair of the leak;

iii. the maximum instrument reading measured by Method 21 of 40 CFR Part 60, Appendix A at the time the leak is successfully repaired or determined to be nonrepairable;

iv. except as otherwise provided in 40 CFR 63.1024(f)(iv) [see Attachment 2], the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; and

v. the dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1024(f))

10. The permittee shall prepare and implement a pump quality assurance program in compliance with 40 CFR 63.1035 [see Attachment 2]. If greater than 10 percent (or three pumps) leak, on a 6-month rolling average, the permittee shall comply with the QIP requirements. Additional record keeping requirements apply while the QIP is in effect.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1035)

11. The permittee shall maintain daily records that document any time periods when the condenser water wash system was not in service when the emissions unit was loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit quarterly reports indicating any exceedances (deviations) of the pressure differential requirements (between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side), and when applicable, the information required under section A.III.2 above.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. Except as otherwise provided in 40 CFR 63.1417 [see Attachment 1], the permittee shall submit semiannual reports indicating any exceedances of the maximum allowable daily average reactor batch process vent condenser exit temperature, and when applicable, the information required under 40 CFR 63.1416(d)(3)(ii) [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1417(f))

3. The permittee shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 CFR 63.1039 [see Attachment 2], as applicable, including:

a. where any delay of repair is utilized pursuant to 40 CFR 63.1024(d) [see Attachment 2], that delay of repair has occurred and the number of instances of delay of repair;

b. if applicable, the initiation of a monthly monitoring program for valves pursuant to 40 CFR 63.1025(b)(3)(i) [see Attachment 2]; and

c. if applicable, the initiation of a quality improvement program for pumps pursuant to 40 CFR 63.1035 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1039)

IV. Reporting Requirements (continued)

4. The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the condenser water wash system was not in service when the emissions unit was loading solid feed stock. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 shall be determined in accordance with the following methods:

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:

1.8 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

1.c Emission Limitation:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR 63.1414 [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1414)

V. Testing Requirements (continued)

2. The permittee shall conduct a design evaluation for the reactor batch process vent condenser in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for a small control device. In compliance with 40 CFR 63.1413(a)(3) the design evaluation shall consider the composition and organic HAP concentration of the vent stream, vent stream flow rate, relative humidity, and temperature and shall establish the operating parameters of the control device, design outlet organic HAP compound concentration level, design average temperature of the condenser exhaust vent stream, and the design average temperatures of the coolant fluid at the condenser inlet and outlet. The temperature of the gas stream exiting the condenser shall be measured and used to establish the outlet organic HAP concentration. The permittee may elect as an alternate to conduct a performance test for a small control device and such a performance test shall follow the procedures specified in 40 CFR 63.1413, as appropriate. The parameter monitoring levels for the reactor batch process vent condenser shall be set based on this design evaluation or performance test.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413)

VI. Miscellaneous Requirements

1. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall develop and implement a start-up, shutdown, and malfunction plan as specified in 40 CFR 63.6(e)(3) [see Attachment 3 and Table 1 in Attachment 1]. As specified in 40 CFR 63.1416(b)(1) [see Attachment 1], this plan shall require the permittee to maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment, or control devices, or recovery devices, or continuous monitoring systems, or control technologies used to comply with Subpart OOO during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur. The requirements of 40 CFR 63.1400(k)(1) through (4) [see Attachment 1], shall be met during periods of start-up, shutdown, malfunction, or non-operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Reactor #5 (P012)

Activity Description: One of four reactor kettles used to produce liquid formaldehyde resins.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
amino/phenolic resin processing unit, general provisions	OAC rule 3745-21-07(G)(2)	See section A.I.2.a.
	40 CFR Part 63, Subpart A	See section A.I.2.b.
	40 CFR Part 63, Subpart OOO	See section A.I.2.c.
reactor batch process vent controlled by a condenser with spray wash system	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	1.8 lbs/hr of particulate emissions
	40 CFR Part 63, Subpart OOO	See section A.I.2.d.
heat exchange systems	40 CFR Part 63, Subpart OOO	See section A.I.2.e.
equipment leaks, controlled by equipment design and operating and maintenance programs	40 CFR Part 63, Subpart OOO	See section A.I.2.f.
storage vessels	40 CFR Part 63, Subpart OOO	See section A.I.2.g.

2. Additional Terms and Conditions

2.a This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

2.b i. 40 CFR Part 63, Subpart A [see Attachment 3] provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 63.

ii. Table 1 of 40 CFR Part 63, Subpart OOO [see Attachment 1] specifies the provisions of 40 CFR Part 63, Subpart A that apply and those provisions that do not apply.

(Authority for term: 40 CFR 63.1400(j))

2. Additional Terms and Conditions (continued)

2.c The provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1] apply to processes that produce amino/phenolic resins and that are located at a plant site that is a major source. This emissions unit is utilized to produce amino/phenolic resins at the BTLSR Toledo plant site, which is a major source of the hazardous air pollutant (HAP) formaldehyde. This emissions unit is therefore subject to the provisions of 40 CFR Part 63, Subpart OOO [see Attachment 1].

(Authority for term: 40 CFR 63.1400(a))

2.d Except as otherwise provided in 40 CFR 63.1406 [see Attachment 1], the permittee shall control organic HAP emissions from the reactor batch process vent by complying with either of the following:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

(Authority for term: 40 CFR 63.1406(a)(2))

2.e There are no applicable requirements for existing heat exchangers (cooling coils) with a minimum cooling water pressure more than 35 kilopascals greater than the maximum process side pressure.

(Authority for term: 40 CFR 63.1409(a)(1))

2.f Except as otherwise provided in 40 CFR Part 63, Subpart OOO [see Attachment 1], the permittee shall establish a leak detection and repair program which complies with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2]. These requirements are described in 40 CFR 63.1029 [see Attachment 2] and 63.1410 [see Attachment 1]. These requirements apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.

(Authority for term: 40 CFR 63.1410)

2.g There are no applicable requirements for existing storage vessels with a capacity of less than 50,000 gallons. The existing storage vessels include the following:

formaldehyde tank (Z009) - 14,600 gallons;
fuel oil tank (Z010) - 10,000 gallons;
PVA tank (Z011) - 14,600 gallons;
"A" system resin spray dryer (P001) tanks - 2 tanks at 1,500 gallons each;
"B" system resin spray dryer (P002) tanks - 2 tanks at 1,000 gallons each;
"C" system resin spray dryer (P003) tanks - 2 tanks at 5,000 gallons each;
MUS tanks - 2 tanks at 4,000 gallons each; and
Wet blend tank - 1,000 gallons.

(Authority for term: 40 CFR 63.1404(a))

II. Operational Restrictions

1. At all times that this emissions unit is in operation, the permittee shall operate the reactor cooling coil heat exchange system with a minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.

(Authority for term: OAC rule 3745-77-07(A)(1))

II. Operational Restrictions (continued)

2. The permittee shall establish parameter monitoring levels for the reactor batch process vent condenser based on a design evaluation or performance test, in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for small control devices. In compliance with Table 4 of 40 CFR Part 63, Subpart OOO [see Attachment 1], these parameter monitoring levels will include the maximum temperature of the gases exiting the condenser established to assure compliance with the emission reduction specified in Section A.I.2.d above.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(1)(ii))

3. Except as otherwise provided in 40 CFR Part 63 Subpart OOO [see Attachment 1], the permittee shall operate each control device such that the daily average of monitored parameters, established as specified in the paragraphs above, remains below the maximum level, as appropriate.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1413(a)(4)(i))

4. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart UU [see Attachment 2] from all equipment, as defined under 40 CFR 63.1402 [see Attachment 1], that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1410)

5. The permittee shall identify equipment subject to the equipment leak standards, in compliance with the requirements of 40 CFR 63.1022 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1022)

6. Except as otherwise provided in 40 CFR 63.1024 [see Attachment 2], the permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected. A first attempt at repair, as defined in 40 CFR 63.1024(a) [see Attachment 2], shall be made no later than 5 days after the leak is detected.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.1024(a))

7. The permittee shall operate the condenser water wash system whenever this emissions unit is loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure differential on a daily basis.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415)

2. The permittee shall operate and maintain a low pressure alarm system which will indicate by visible and audible means that the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side has dropped below the required 35 psia minimum. If the pressure differential drops below 35 psia, the permittee shall record the beginning and ending times of the deviation, and the actions taken to alleviate the deviation.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

3. Except as otherwise provided in 40 CFR 63.1413 [see Attachment 1], the permittee shall establish parameter monitoring levels by design evaluation, or during the performance test of, the reactor batch process vent condenser.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413(a)(1)(ii))

4. Except as otherwise provided in 40 CFR 63.1415 [see Attachment 1], the permittee shall maintain and operate a reactor batch process vent condenser exit temperature monitoring device equipped with a continuous recorder. This monitoring equipment shall be in operation at all times when the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1415(a), (a)(1), (b)(3))

5. Except as otherwise provided in 40 CFR 63.1416 [see Attachment 1], the permittee shall maintain records of the daily average reactor batch process vent condenser exit temperature.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(c))

6. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall maintain records of the occurrence and duration of each start-up, shutdown, or malfunction during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur, records reflecting whether the procedures specified in the affected source's start-up, shutdown, and malfunction plan were followed and documentation of actions taken that are not consistent with the plan.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

7. As provided in 40 CFR 63.1416(d) [see Attachment 1], where applicable the permittee shall maintain records of operation when monitors are not operating, operation of bypass lines, inspections and operation of the seal or closure mechanisms, and records specifying the times and duration of periods of monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(d))

8. The permittee shall comply with the requirements of 40 CFR 63.1029 [see Attachment 2]. Pumps, valves, connectors, agitators, pressure relief devices, and instrumentation systems in heavy liquid service shall be monitored.

i. If evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method, the equipment shall be repaired. Repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.

ii. Within 5 days of a the detection of a potential leak, the equipment shall be monitored by instrument reading using Method 21 of 40 CFR Part 60, Appendix A, as specified in 40 CFR 63.1023 [see Attachment 2]. If an instrument reading of 10,000 parts per million or greater for agitators, 5,000 parts per million or greater for pumps handling polymerizing monomers, or 2,000 parts per million or greater for all other pumps, or 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured, a leak is detected and shall be repaired pursuant to 40 CFR 63.1024 [see Attachment 2], as applicable.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1029)

III. Monitoring and/or Record Keeping Requirements (continued)

9. For each leak detected, the information specified below shall be recorded and maintained:

i. the date of first attempt to repair the leak;

ii. the date of successful repair of the leak;

iii. the maximum instrument reading measured by Method 21 of 40 CFR Part 60, Appendix A at the time the leak is successfully repaired or determined to be nonrepairable;

iv. except as otherwise provided in 40 CFR 63.1024(f)(iv) [see Attachment 2], the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; and

v. the dates of process unit or affected facility shutdowns that occur while the equipment is unrepaired.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1024(f))

10. The permittee shall prepare and implement a pump quality assurance program in compliance with 40 CFR 63.1035 [see Attachment 2]. If greater than 10 percent (or three pumps) leak, on a 6-month rolling average, the permittee shall comply with the QIP requirements. Additional record keeping requirements apply while the QIP is in effect.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1035)

11. The permittee shall maintain daily records that document any time periods when the condenser water wash system was not in service when the emissions unit was loading solid feed stock.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit quarterly reports indicating any exceedances (deviations) of the pressure differential requirements (between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side), and when applicable, the information required under section A.III.2 above.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. Except as otherwise provided in 40 CFR 63.1417 [see Attachment 1], the permittee shall submit semiannual reports indicating any exceedances of the maximum allowable daily average reactor batch process vent condenser exit temperature, and when applicable, the information required under 40 CFR 63.1416(d)(3)(ii) [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1417(f))

3. The permittee shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 CFR 63.1039 [see Attachment 2], as applicable, including:

a. where any delay of repair is utilized pursuant to 40 CFR 63.1024(d) [see Attachment 2], that delay of repair has occurred and the number of instances of delay of repair;

b. if applicable, the initiation of a monthly monitoring program for valves pursuant to 40 CFR 63.1025(b)(3)(i) [see Attachment 2]; and

c. if applicable, the initiation of a quality improvement program for pumps pursuant to 40 CFR 63.1035 [see Attachment 2].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1039)

IV. Reporting Requirements (continued)

4. The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the condenser water wash system was not in service when the emissions unit was loading solid feed stock. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 shall be determined in accordance with the following methods:

1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:

1.8 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

1.c Emission Limitation:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR 63.1414 [see Attachment 1].

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1414)

V. Testing Requirements (continued)

2. The permittee shall conduct a design evaluation for the reactor batch process vent condenser in compliance with the requirements of 40 CFR 63.1413 [see Attachment 1] for a small control device. In compliance with 40 CFR 63.1413(a)(3) the design evaluation shall consider the composition and organic HAP concentration of the vent stream, vent stream flow rate, relative humidity, and temperature and shall establish the operating parameters of the control device, design outlet organic HAP compound concentration level, design average temperature of the condenser exhaust vent stream, and the design average temperatures of the coolant fluid at the condenser inlet and outlet. The temperature of the gas stream exiting the condenser shall be measured and used to establish the outlet organic HAP concentration. The permittee may elect as an alternate to conduct a performance test for a small control device and such a performance test shall follow the procedures specified in 40 CFR 63.1413, as appropriate. The parameter monitoring levels for the reactor batch process vent condenser shall be set based on this design evaluation or performance test.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1413)

VI. Miscellaneous Requirements

1. Except as otherwise provided in 40 CFR 63.1416(b) [see Attachment 1], the permittee shall develop and implement a start-up, shutdown, and malfunction plan as specified in 40 CFR 63.6(e)(3) [see Attachment 3 and Table 1 in Attachment 1]. As specified in 40 CFR 63.1416(b)(1) [see Attachment 1], this plan shall require the permittee to maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment, or control devices, or recovery devices, or continuous monitoring systems, or control technologies used to comply with Subpart OOO during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur. The requirements of 40 CFR 63.1400(k)(1) through (4) [see Attachment 1], shall be met during periods of start-up, shutdown, malfunction, or non-operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1416(b))

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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