*****Replicable Testing Procedures*****

Lasco Bathware, Yelm Washington (Fiberglass Reinforced Plastic Bathware Industry)

Process Description:
Emissions Monitoring Technique:
Emissions Calculation:
Pollutant Control Technique:

Process Description/Emission Calculation: Lasco's permit includes replicable testing procedures for VOC source testing used to develop emission factors. Section 6.9 Emission Calculations includes a section on how updated emission factors are to be developed and used.

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6. COMPLIANCE MONITORING CONDITIONS

6.9 Emission Calculations. For purposes of monitoring compliance with daily and annual VOC emission limitations in this permit, VOC emissions shall be determined as follows:

a) Calculations - * * * * *

b) Emission Factors - Emission factors used for determining compliance with emission limitations in this permit shall be approved by ORCAA as follows:

i) Emission factors shall be based on measured pollutant concentrations from an ORCAA approved source test.

ii) Test methods shall conform to EPA Method 18 (40 CFR Part 60, App. A, Method 18, including Section 7.4 alternative NIOSH procedure- NIOSH Method 1501), or an equivalent method as approved by ORCAA.

iii) At least 30 days prior to any scheduled source test date, the permittee shall submit a source test plan to ORCAA which identifies proposed test methods, operational conditions, and other details regarding the proposed source test.

iv) No later than 60 days after conducting the source test, the permittee shall forward to ORCAA test results and calculations supporting the proposed emission factor(s).

v) Upon written notification of approval from ORCAA, approved emission factors shall be used to quantify emissions from the source test date forward.

Emissions Monitoring Technique: See Section 6 "Compliance Monitoring Conditions" of the complete Lasco permit; nothing unique concerning flexible permit provisions.
Pollutant Control Technique: See Section 5 "Emission Unit Specific Requirements" for the regenerative thermal oxidizer.

5. EMISSION UNIT SPECIFIC REQUIREMENTS

REQUIREMENTS SPECIFIC TO EU1 and EU2

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615
5.1	00NOC011 Conditions 2, 3, and 5 4/13/2001	**RTO Emission Reduction Credit.**An RTO destruction efficiency of at least 96% may only be credited when emissions pass through the RTO and the RTO combustion chamber temperature is at least 1600ºF.	None	6.8
5.2	00NOC011 Condition 4 4/13/2001	**RTO Combustion Chamber Temperature Monitoring.**The RTO combustion chamber temperature shall be recorded continuously on a strip chart recorder or electronically by the RTO control unit.	None	6.8
5.3	00NOC011 Condition 8 4/13/2001	**RTO Opacity Standard.**Visual emissions from the RTO shall not exceed ten (10) percent opacity as determined by EPA Method 9.	EPA Method 9	6.1 6.2 6.3
5.4	00NOC011 Condition 9 4/13/2001	**RTO Operation and Maintenance Plan.**An Operation and Maintenance (O&M) plan for the RTO shall be devised and available to the operator.	NA	None