

# Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Cognis Corp (Henkel Corporation, Chemicals Group)	
Premise Number	1431070035	
Number of Non-insignificant Emissions Units	33	
What makes this facility a Title V facility?	SO2, VOC, PM, NOx, and CO	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
A.1.	N	Y	This facility is subject to the requirements of 40 CFR Part 68, Risk Management Plans.
B.1.	Y	N	Listing of insignificant emissions units.

**C Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

C If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

**Part III (Requirements Within the State & Federally Enforceable Section)**

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
B002	20 % opacity as a six-minute average	17-07(A)	N	N	Y	Y	Y	N	N	OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M- daily VE observations will be made. R- A log of the VE observation results will be kept. Rp- Semi-annual reports will be submitted should VE problems be identified. ET- Emissions testing is not necessary to demonstrate compliance. Misc. -None
	.37 lb PE/MMBTU	17-10(C)	N	N	Y	Y	Y	N	N	
	1.6 lbs SO2/MMBTU	18-06(C)	N	Y	Y	Y	Y	N	N	OR- Sulfur content and heat content restrictions are in place. CAM is not applicable at this time. M-Sulfur content and heat content analysis is performed on all shipments of oil. R- Records of the sulfur content and heat content analysis are maintained. Rp- Deviation reporting for any calculated SO2 exceedence is in place. ET- Emissions testing is not necessary to demonstrate compliance. Misc. -None.
B009 and B013	20 % opacity as a six-minute average	17-07(A)	N	Y	N	Y	Y	N	N	OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M-This emissions unit burns only natural gas, no monitoring requirements are necessary. R- Records of the type of fuel combusted are maintained. Rp- Reports are submitted if any type of fuel other than natural gas is combusted. ET-No emissions testing is necessary to demonstrate compliance. Misc.- None.
	0.020 lb PE/MMBTU	17-10(B)	N	Y	N	Y	Y	N	N	

B014 and B015	.8 lb SO2/ MMBTU when burning # 4 fuel oil	31- 05(D)	Y	Y	Y	Y	Y	N	N	<p>When burning # 4 fuel oil: OR- Sulfur content and heat content restrictions are in place. CAM is not applicable at this time. M-Sulfur content and heat content analysis is performed on all shipments of oil. R- Records of the sulfur content and heat content analysis are maintained. Rp- Deviation reporting for any calculated SO2 exceedence is in place. ET- Emissions testing is not necessary to demonstrate compliance. Misc. -None.</p> <p>When burning natural gas: OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M-When burning natural gas, no monitoring requirements are necessary. R- Records of the type of fuel combusted are maintained. Rp- No reporting requirements are necessary to show compliance when this emissions unit is burning natural gas. ET-No emissions testing is necessary to demonstrate compliance. Misc.- None.</p>
	0.0 lb SO2/ MMBTU when burning natrual gas	18- 37(D)	N	N	N	N	N	N	N	
	0.18 lb PE/ MMBTU when burning # 4 fuel oil	17- 10(C)	N	N	Y	Y	Y	N	N	<p>For Natural Gas and #4 Fuel Oil OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M- Daily VE observations will be made when burning #4 Fuel Oil. R- A log of the VE observation results will be kept. Rp- Semi-annual reports will be submitted should VE problems be identified. ET- Emissions testing is not necessary to demonstrate compliance. Misc. -None</p>
	0.020 lb PE/ MMBTU when burning natrual gas	17- 10(B)	N	N	Y	Y	Y	N	N	
	20 % opacity as a six- minute average	17- 07(A)	N	N	Y	Y	Y	N	N	

	0.45 lb NOx/ MMBTU when burning # 4 fuel oil	31-05(D)	Y	N	N	N	N	N	N	For Natural Gas and #4 Fuel Oil OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M- No monitoring requirements are necessary to show compliance. R- No record keeping requirements are necessary to show compliance Rp- No reporting requirements are necessary to show compliance ET-No emissions testing is necessary to demonstrate compliance. Misc.- None.
	0.20 lb NOx/ MMBTU when burning natrual gas	31-05(D)	Y	N	N	N	N	N	N	
	Annual capacity factor not to exceed 10% for the use of natural gas	31-05(D)	Y	Y	Y	Y	Y	N	N	OR-The total heat input from the combustion of natural gas is limited to 129,360 MMBTU/Yr M- The amount and type of fuel are monitored on a daily basis. R- The capacity factor is caluclated on a monthly basis as a twelve-month rolling summation. Rp- Deviation reporting for the capacity factor is in place. An annual report is required for the calculation of the annual capacity factor. ET-No emissions testing is necessary to demonstrate compliance. Misc.-None
B027	1.2 lbs of SO2/ MMBTU of actual heat input when burning coal	N	40 CFR 60, Db	Y	Y	Y	Y	Y	N	When burning coal: OR- Sulfur content and heat content restrictions are in place. CAM is not applicable at this time. M-Sulfur content and heat content analysis is performed on coal on an as burned basis. R- Records of the sulfur content and heat content analysis are maintained. Rp- Deviation reporting for any calculated SO2 exceedence is in place. ET- Emissions testing will be performed twice during the permit cycle. Misc. -None.
	.8 lb of SO2/ MMBTU of actual heat input when burning fuel oil	N	40 CFR 60, Db	Y	Y	Y	Y	N	N	When burning oil: OR- Sulfur content and heat content restrictions are in place. CAM is not applicable at this time. M-Sulfur content and heat content analysis is performed on all shipments of oil. R- Records of the sulfur content and heat content analysis are maintained. Rp- Deviation reporting for any calculated SO2 exceedence is in place. ET- Emissions testing is not necessary to demonstrate compliance when burning oil. Misc. -None.

	<p>.10 lb of PE/ MMBTU of actual heat input when burning coal</p> <p>Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except for one six-minute period per hour of not more than twenty seven percent opacity.</p>	N	40 CFR 60, Db	Y	Y	Y	Y	Y	N	<p>OR- Enuissions from this emissions unit must be vented to an ESP. CAM is not applicable at this time.</p> <p>M-A particulate matter COM is in place for this emissions unit.</p> <p>R- The opacity is continually measured.</p> <p>Rp-Excess emission reports are required on a quarterly basis.</p> <p>ET-Two PE emission stack tests are required during the permit cycle.</p> <p>Misc.-None.</p>
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	0.20 lb NOx/ MMBTU when burning gaseous fossil fuels  0.30 lb NOx/ MMBTU when burning liquid fossil fuels  0.70 lb NOx/ MMBTU when burning solid fossil fuels	N	40 CFR 60, Db	N	N	N	N	N	N	For gaseous, liquid, and solid fossil fuels: OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M- No monitoring requirements are necessary to show compliance. R- No record keeping requirements are necessary to show compliance Rp- No reporting requirements are necessary to show compliance ET-No emissions testing is necessary to demonstrate compliance. Misc.- None.
	3200 grams of mercury per 24 hour period	N	40 CFR 61, E	N	Y	Y	Y	N	N	OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M-Composite samples of liquid organic residues and sludges are taken and analyzed on a monthly basis for the concentration of mercury. R- Records of the analysis of the composite samples are kept on site. Rp-Annual summary reports for mercury sampling are submitted. ET-No emissions testing is necessary to demonstrate compliance. Misc. -None
B028	.06 lb PE/ MMBTU  20% opacity as a six-minute average	N	Y	Y	Y	Y	Y	Y	N	OR- Emissions from this emissions unit must be vented to a baghouse. CAM is not applicable at this time. M-The pressure drop across the baghouse is continuously monitored. R- The pressure drop across the baghouse is recorded on a daily basis. Rp- Pressure drop deviation reports are required on a quarterly basis. ET-Two PM emission stack test are required during the permit cycle. Misc.-None.
	1.2 lbs SO2/ MMBTU	N	Y	Y	Y	Y	Y	Y	N	OR- Sulfur content and heat content restrictions are in place. CAM is not applicable at this time. M-Sulfur content and heat content analysis is performed on coal on an as received basis. R- Records of the sulfur content and heat content analysis are maintained. Rp- Deviation reporting for any calculated SO2 exceedence is in place. ET- Emissions testing will be performed twice during the permit cycle. Misc. -None.

	0.70 lb NOx/MMBTU	N	Y	N	N	N	N	N	N	OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M- No monitoring requirements are necessary to show compliance. R- No record keeping requirements are necessary to show compliance Rp- No reporting requirements are necessary to show compliance ET-No emissions testing is necessary to demonstrate compliance. Misc.- None.
P004 P007 P010 P016 P017 P019 P024 P025 P036 P045 P048 P051 P053 P057 P058 P059 P064 P097 P100 P101 P102 P103 P801	None*  *The emission limitations in OAC rule 3745-21-07(G)(2) only apply if PRM's are employed; fatty acids are produced at this facility, no PRM's are employed.	21-07(G)(2)	N	N	N	Y	Y	N	N	OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M- No monitoring requirements are necessary to show compliance. R- Records of the solvents employed and whether or not they are PRM are kept. Rp- Deviation reports are submitted should a PRM be employed. ET-No emissions testing is necessary to demonstrate compliance. Misc.- None.
P902	43.9 lbs PE/hr  20% opacity as a six-minute average	17-11(A)	N	Y	Y	Y	Y	N	N	OR-The emissions from the coal handling operations are required to be vented to a baghouse with a pressure drop between 5-7 inches. M-The pressure drop across the baghouse is monitored. R- The pressure drop across the baghouse is monitored and recorded on a daily basis. Rp- Pressure drop deviation reports are submitted ET-No emissions testing is necessary to demonstrate compliance. Misc.- None.

T008 & T009	The permittee shall employ submerged fill when loading PRM's	21-07(D)  40 CFR 60, Kb	N	N	N	N	N	N	N	OR- No operational restrictions are necessary to show compliance. CAM is not applicable at this time. M- No monitoring requirements are necessary to show compliance. R- No record keeping requirements are necessary to show compliance Rp- No reporting requirements are necessary to show compliance ET-No emissions testing is necessary to demonstrate compliance. Misc.- None.  R- Record keeping per 40 CFR 60, Subpart Kb.
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EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

**C Instructions for Part III:**

C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

C If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section.

To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M", "R", "Rp" and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. Also, if a "Y" is noted under "OR" or "Misc," an explanation of the requirements should be provided in the "Comments" section. In addition to a general explanation of the "OR" and/or "Misc," the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If superseding language is included in the "Miscellaneous Requirements" section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an "N" is noted in the "OR" column or in the "Misc" column.

C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.