

Statement of Basis For Title V Permit

Company Name	Kraton Polymers	
Premise Number	0684010011	
Number of Non-insignificant Emissions Units	20	
What makes this facility a Title V facility?	Particulate, SO2, NOx, CO, VOC	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1, A.2, A.3, A.4 AND A.5	N	40 CFR Part 63, Subpart H	Hazardous Organic NESHAP (HON) Leak Detection and Repair Program

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							
B005 B007 B009	1215 lb/hr SO2	N	Y	N	Y	Y	Y	Y	N	This limit was developed based upon BAT and 3745-31-05.
B005 B007	2.25 lb/mmBtu SO2	N	Y	N	Y	Y	Y	Y	N	This limit was developed based upon BAT and 3745-31-05.
B005 B007 B008 P012 P013 P015 Z006	2.5 lb/mmBtu SO2	N	Y	N	Y	Y	Y	Y	N	The limit was developed based upon 40 CFR 52.1881.
B005 B007 B008 P004 P005 P006 P007 P009 P010 P011 P012 P013 P015 Z006	20% opacity as a 6 min. avg.	17-07	N	N	Y	Y	Y	Y	N	
B005 B007	0.12 lb/mmBtu PM	17-10	N	Y	Y	Y	Y	Y	N	
B008 B009	0.020 lb/mmBtu PM	17-10	N	N	Y	Y	Y	Y	N	Monitoring, recording and reporting requirements are of the inherently clean language developed by Ohio EPA.
B008	1.6 lb/mmBtu SO2	N	Y	N	Y	Y	Y	Y	N	The limit was developed based upon OAC rule 3745-18-06.
B009	102 lb/hr SO2	N	Y	N	Y	Y	Y	Y	N	This limit was developed based upon BAT and 3745-31-05.

B009	0.30 lb/mmBtu Nox	N	Y	N	N	N	N	N	N	This limit was developed based upon BAT and 3745-31-05. Compliance with the NOx limit is assumed based on emissions factors for burning natural gas and #2 fuel oil.
P004	10.9 lb/hr PM	17-11	N	Y	Y	Y	Y	Y	N	A pressure drop range has been established in the Operational Requirements section.
P004 P006 P007 P010 T036 Z017	No VE's except 5 min per 2 hours	N	Y	N	Y	Y	Y	Y	N	The limit was developed based upon 40 CFR 63.11(b)(4)
P004 P006 P007 P010 T036 Z017 T054 T055	Leak Detection and Repair Program (HON)	N	40 CFR Part 63 Subpart H	Y	Y	Y	Y	N	N	These requirements are contained in section II.A of the Specific Facility Terms and Conditions.
P005	14.4 lb/hr PM	17-11	N	Y	Y	Y	Y	Y	N	A pressure drop range has been established in the Operational Requirements section.
P006	33.0 lb/hr PM	17-11	N	Y	Y	Y	Y	Y	N	A pressure drop range has been established in the Operational Requirements section.
P006 P007 P010	85% reduction of VOC's	21-07	N	N	Y	Y	Y	Y	N	
P006 P007 P010	smokeless flare	21-07	N	N	Y	Y	Y	Y	N	
P007	0.4 lb/hr and 1.8 TPY PM	N	Y	Y	Y	Y	Y	Y	N	This limit was developed based upon BAT and 3745-31-05. A pressure drop range has been established in the Operational Requirements section.
P007	9 lb/hr and 39 TPY VOC	N	Y	N	Y	Y	Y	Y	N	This limit was developed based upon BAT and 3745-31-05.
P007	0.7 lb/hr and 3 TPY NOx	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05.
P007	14.7 lb/hr and 64 TPY CO	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05.

P010	27.9 lb/hr PM	17-11	N	Y	Y	Y	Y	Y	N	A pressure drop range has been established in the Operational Requirements section.
P009	0.2 lb/hr and 0.2 TPY PM	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn natural gas only.
P009	0.002 lb/hr and 0.002 TPY SO2	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn natural gas only.
P009	1 lb/hr and 1 TPY VOC	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn natural gas only.
P009	4.2 lb/hr and 4.2 TPY NOx	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn natural gas only. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of natural gas and no monitoring, record keeping or reporting is necessary.
P009	2.1 lb/hr and 2.1 TPY CO	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn natural gas only. Compliance is based upon the burning of natural gas and no monitoring, record keeping or reporting is necessary.
P011	0.09 lb/hr and 0.02 TPY PM	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P011	0.79 lb/hr and 0.15 TPY SO2	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P011	0.15 lb/hr and 0.03 TPY VOC	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P011	7.94 lb/hr and 1.54 TPY NOx	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P011	2.6 lb/hr and 0.5 TPY CO	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P012	8.68 lb/hr NOx	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P012	1.87 lb/hr CO	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.

P012 P015 Z006	0.25 lb/mmBtu or 0.31 lb/mmBtu PM	17-11	N	N	N	N	N	Y	N	Permittee required to burn #2 fuel oil only. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P013	9.61 lb/hr and 12.6 TPY NOx	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P013	2.07 lb/hr and 2.7 TPY CO	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P013	0.68 lb/mmBtu PM	17-11	N	N	N	N	N	Y	N	Permittee required to burn #2 fuel oil only. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P015	8.68 lb/hr and 28 TPY NOx	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Permittee required to burn #2 fuel oil only. Compliance is based upon the burning of #2 fuel oil and no monitoring, record keeping or reporting is necessary.
P015	1.87 lb/hr and 6.2 TPY CO	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Compliance is based upon submerged filling, and the maximum vapor pressure, no monitoring, record keeping or reporting is necessary.
T054 T055	2.7 TPY Styrene	N	Y	N	N	N	N	Y	N	This limit was developed based upon BAT and 3745-31-05. Compliance is based upon submerged filling, and the maximum vapor pressure, no monitoring, record keeping or reporting is necessary.
T035	No Limits	21-09	N	N	N	N	N	N	N	In accordance with OAC rule 3745-21-09(L)(2)(a), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = record keeping 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, record keeping, 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.