Facility Identification Data
Name: HENKEL CORP
Address: 710 OHIO ST-MAIN-22 BUILDING
BUFFALO, NY 14203

Owner/Firm
Name: HENKEL CORPORATION
Address: 2200 RENAISSANCE BLVD STE 200
KING OF PRUSSIA, PA 19406, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
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710 OHIO ST
BUFFALO, NY 14203
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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
Application for renewal of Air Title V Facility.

Attainment Status
HENKEL CORP is located in the town of BUFFALO in the county of ERIE.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description
Henkel Corp., 710 Ohio St., is a facility that manufactures a broad array of adhesives and specialty coatings for sale to the construction, electronics, automotive building and fabricating industries. We currently operate 42 production mixing vessels, 2 operations that manufacture Dualite - a polymeric microscopic product that is coated with an inert material (i.e., calcium carbonate), and a production operation that dries water moisture content from the incoming raw material polymeric microspheres. The production mixing vessels range in capacity from 10 to 2420 gallons. We operate 27 storage tanks, of these 14 are outdoor AST's and 3 are indoor finished product storage tanks, the remaining store non-regulated/non-hazardous materials. Dualite production equipment (patented process) consists of equipment such as: heated expanding units, material conveying systems, dust collectors, storage tanks and filling line/ production equipment. The microspheres drying equipment consists of a Thermajet drying unit, process air heater, cyclone and a dust collector unit. We utilize a broad array of solvents, resins, rubbers, additives, etc., to manufacture our finished products. The facility also maintains a sizable research and development department and assorted pilot plants (Bldg. #24). The R&D labs comprise a significant portion of the building's second floor.

Permit Structure and Description of Operations
The Title V permit for HENKEL CORP
is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.
A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.
[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e.

parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

HENKEL CORP is defined by the following emission unit(s):
Emission unit 001001 - A group of 35 mixing vessels serviced by exhaust points 0003X, 0004X, 0042X, 0043X, 0045X, 0046X, 0030X, 0077X, 0078X, 0079X, 0085X, 0086X, 0103X, 0104X, 0105X, 106X, 107X and 0108X. The mixers are located in buildings #21, 17 and 22. The mixing vessels are designated as follows: M93, M94, M95, M96, M97, M98, M99, M100, M101, M102, M102A, M103, M104, M104A, M105, M106, M107, M108, M109, M110, M111, M112, M202, M203, M204, M205, M206, M207, M208, M209, M210, M211, M212, M214 and M215. The mixing vessels are, or can be used, for the manufacture of VOC/HAP - solvent based adhesives and coatings. The vessels range in capacity from 550-2420 gallons.
Emission unit 001001 is associated with the following emission points (EP):
0002X, 0003X, 0004X, 0030X, 0042X, 0045X, 0046X, 0077X, 0078X, 0079X, 0085X, 0086X, 0103X, 0104X, 0105X, 0106X, 0107X, 0108X
It is further defined by the following process(es):
Process: 093 is located at UPPER AND LOWER, Building 21 - Mixer #93 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 094 is located at UPPER AND LOWER, Building 21 - Mixer #94 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 095 is located at UPPER AND LOWER, Building 21 - Mixer #95 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 096 is located at UPPER AND LOWER, Building 21 - Mixer #96 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 097 is located at UPPER AND LOWER, Building 21 - Mixer #97 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 098 is located at UPPER AND LOWER, Building 21 - Mixer #98 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Process: 099 is located at UPPER AND LOWER, Building 17 - Mixer #99 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 100 is located at UPPER AND LOWER, Building 17 - Mixer #100 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 101 is located at UPPER AND LOWER, Building 17 - Mixer #101 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 102 is located at UPPER AND LOWER, Building 17 - Mixer #102 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 103 is located at UPPER AND LOWER, Building 17 - Mixer #103 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 104 is located at UPPER AND LOWER, Building 17 - Mixer #104 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 105 is located at UPPER AND LOWER, Building 17 - Mixer #105 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 106 is located at UPPER AND LOWER, Building 17 - Mixer #106 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 107 is located at UPPER AND LOWER, Building 17 - Mixer #107 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 108 is located at UPPER AND LOWER, Building 17 - Mixer #108 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 109 is located at UPPER AND LOWER, Building 17 - Mixer #109 is a 550 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished

product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 110 is located at UPPER AND LOWER, Building 17 - Mixer #110 is a 550 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 111 is located at UPPER AND LOWER, Building 17 - Mixer #111 is a 550 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 112 is located at UPPER AND LOWER, Building 17 - Mixer #112 is a 550 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 192 is located at UPPER AND LOWER, Building 17 - Mixer #102A is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 194 is located at UPPER AND LOWER, Building 17 - Mixer #104A is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 203 is located at UPPER AND LOWER, Building 21 - Mixer #203 is a 2420 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 204 is located at UPPER AND LOWER, Building 17 - Mixer #204 is a 2420 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 205 is located at UPPER AND LOWER, Building 17 - Mixer #205 is a 2145 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 206 is located at UPPER AND LOWER, Building 17 - Mixer #206 is a 2200 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 207 is located at UPPER AND LOWER, Building 21 - Mixer #207 is a 1870 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 208 is located at UPPER AND LOWER, Building 22 - Mixer #208 is a 1000 gallon capacity vessel that is

utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 209 is located at UPPER AND LOWER, Building 21 - Mixer #209 is a 2420 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.
Process: 210 is located at upper & lower, Building 21 - Stir and blend mixer used for manufacture of broad array of voc/solvent based adhesives and coatings. 1925 gallon capacity.
Process: 214 is located at Upper and lower, Building 21 - Stirring and blending mixer used for manufacture of broad array of VOC/solvent-based adhesives and coatings.
Process: 215 is located at upper and lower, Building 21 - Stirring and blending mixer used for manufacture of broad array of VOC/solvent-based adhesives and coatings.

Emission unit 001021 - Portable tote tank reconditioning and cleaning equipment located within building 32C. Process involves manual cleaning of 330-360 gallon portable tote tanks upon return from customers. Totes are cleaned with various solvents (primarily acetone) so that they can be reused for product shipment to customers. Emission points #0050X and 0051X service the operation.
Emission unit 001021 is associated with the following emission points (EP):
0050X, 0051X
It is further defined by the following process(es):
Process: TTR is located at Building 32C - This process involves portable tote tank reconditioning and manual cleaning of 330-360 gallon portable tote tanks upon return from customers. Totes are cleaned with various solvents (primarily acetone) so that they can be reused for product shipment to customers.

Emission unit 001041 - A production process for Dualite finished product located in Building 2A. Emission points 44X and 74X are associated with the patented process. See attachments for additional description. Confidential process.
Emission unit 001041 is associated with the following emission points (EP):
0044X
It is further defined by the following process(es):
Process: 041 is located at 1ST W/MEZZANINES, Building 2A - Production process for dualite, a microscopic polymer sphere, is heated for expansion and blended with an inert such as calcium carbonate. The raw materials are conveyed, weighed, blended, heated for expansion and the finished product is pumped to storage tanks and later pumped into containers for sale. See the Buffalo Dualite process drawing for additional information. The process is referred to as either D-1 or "old line".
Process: 946 is located at 1ST W/MEZZANINES, Building 2A - Storage tank T-46 contains Dualite finished product. The storage tank has a capacity of 420 ft.3 or 3142 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.
Process: 947 is located at 1ST W/MEZZANINES, Building 2A - Storage tank T-47 contains Dualite finished product. The storage tank has a capacity of 420 ft.3 or 3142 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process dia gram and additional product description.
Process: 948 is located at 1ST W/MEZZANINES, Building 2A - Storage tank T-48 contains Dualite finished product. The storage tank has a capacity of 420 ft.3 or 3142 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process dia gram and additional product description.

Emission unit 001042 - A production process for Dualite finished product located in Building 32A. Emission points 48X and 49X are associated with the patented process. See attachments for additional description. Confidential

process.
Emission unit 001042 is associated with the following emission points (EP):
0048X, 0049X
It is further defined by the following process(es):
Process: 042 is located at 1ST W/MEZZANINES, Building 32A - Production process for Dualite, a microscopic polymer sphere, is heated for expansion and blended with an inert such as calcium carbonate. The raw materials are conveyed, weighed, blended, heated for expansion and the finished product is pumped to storage tanks and later pumped into containers for sale. See the Buffalo Dualite process drawing for additional information. The process is referred to as either D-2 or "new line".
Process: 949 is located at 1ST W/MEZZANINES, Building 32A - Storage tank T-49 contains Dualite finished product. The storage tank has a capacity of 1050 ft.3 or 7855 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.
Process: 950 is located at 1ST W/MEZZANINES, Building 2A - Storage tank T-50 contains Dualite finished product. The storage tank has a capacity of 1050 ft.3 or 7855 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.
Process: 951 is located at 1ST W/MEZZANINES, Building 2A - Storage tank t-51 contains Dualite finished product. The storage tank has a capacity of 1050 ft.3 or 7855 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.
Process: 952 is located at 1ST W/MEZZANINES, Building 2A - Storage tank T-52 contains Dualite finished product. The storage tank has a capacity of 1050 ft.3 or 7855 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.

Emission unit 001043 - Equipment associated with a patented polymeric microsphere drying process. The equipment is located in Building 32A. Emission point 47X services the dust collector. See attachments for additional description. Confidential process.
Emission unit 001043 is associated with the following emission points (EP):
0047X
It is further defined by the following process(es):
Process: 043 is located at 1st w/mezzanines, Building 32A - Production process for microsphere drying. The process is internally designated D-3 or “microsphere drying operation”. Water content is removed from the raw material polymeric microscopic spheres. This takes place in a natural gas fired air stream. The dried material is separated from the air stream via cyclone. A baghouse collects residuals. The dried raw material is collected in fiber drums and is later introduced as a raw material in the Dualite production process. See attached drawing for additional info.

Emission unit 001331 - Emission unit consists of 5 Cowles type mixers, 2 post type mixers and two tubs that range in capacity from 10 to 185 gallons. The equipment is serviced by exhaust point 43X. See attachments for additional description. The internal designation for equipment associated with emission unit 0-01331 are: C-1, C-2, C-3, C-4, C-5, P-1, P-2, and H-1. The equipment is located in Building #22.
Emission unit 001331 is associated with the following emission points (EP):
0043X
It is further defined by the following process(es):
Process: 331 is located at UPPER, Building 22 - Cowles mixer C-1 is a 10 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality standards. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.
Process: 332 is located at UPPER, Building 22 - Cowles mixer C-2 is a 10 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality specs. The finished product is gravity filtered

from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.
Process: 333 is located at UPPER, Building 22 - Cowles mixer C-3 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality standards. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.
Process: 334 is located at UPPER, Building 22 - Cowles mixer C-4 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality specs. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.
Process: 335 is located at UPPER, Building 22 - Cowles mixer C-5 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality standards. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.
Process: 341 is located at UPPER, Building 22 - Post mixer P-1 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality specs. T he finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.
Process: 342 is located at UPPER, Building 22 - Post mixer P-2 is a 20 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality standards . the finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.
Process: 351 is located at UPPER, Building 22 - Hoisted tub H-1 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the tub, mixed and blended until they conform to quality specs. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable C&P mixer arrangement drawing attached for additional information.

Emission unit 001901 - A group of 12 aboveground storage tanks (10 that are outdoors) that range in capacity from 4400 to 19400 gallons. The tanks are designated as follows: AST01, AST02, AST03, AST04, AST05, AST06, AST07, AST08, AST09, AST10, T077A, & T080A.
Emission unit 001901 is associated with the following emission points (EP):
000TF, 0037X, 0038X
It is further defined by the following process(es):
Process: 901 is located at AST FARM, Building TANK FARM - An aboveground storage tank, T0001, containing toluene with a 19400 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.
Process: 902 is located at AST FARM, Building TANK FARM - An aboveground storage tank, T0002, containing n-hexane with a 19400 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.
Process: 903 is located at AST FARM, Building TANK FARM - An aboveground storage tank, T0003, containing acetone with a 19400 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.
Process: 904 is located at AST FARM, Building TANK FARM - An aboveground storage tank, T0004, containing isopropyl alcohol with a 14000 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.
Process: 905 is located at AST FARM, Building TANK FARM - An aboveground storage tank, T0005, containing ethyl acetate with a 14000 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank.

Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.
Process: 906 is located at AST FARM, Building TANK FARM - An aboveground storage tank, T0006, containing methylene chloride with a 14000 gallon capacity. Tanks trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.
Process: 907 is located at AST FARM, Building TANK FARM - An aboveground storage tank, T0007, containing methyl ethyl ketone with a 14000 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.
Process: 908 is located at AST FARM, Building TANK FARM - An aboveground storage tank, T0008, containing lactol spirits (containing 14% toluene) with a 14000 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.
Process: 909 is located at AST FARM, Building TANK FARM - An aboveground storage tank, T0009, containing p-amyl acetate with a 14000 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.
Process: 910 is located at outdoors, Building TANK FARM - Storage tank T-10 will contain n-propyl bromide, CAS #106-94-5. The AST capacity is 14000 gallons. Tank trucks are unloaded by pump and solvent is transferred to the AST. Solvent will be pumped from the AST and metered into various mixing vessels via manifolded piping systems.
Process: 977 is located at FIRST FLOOR, Building 3 - Storage tank T-77 contains finished product that contains ethyl acetate, toluene and lactol spirits. The AST capacity is 8,000 gallons. Raw materials are pumped into the tank and circulated and then pumped off through piping/filling station into containers.
Process: 980 is located at FIRST FLOOR, Building 3 - Storage tank T-80 contains finished product that contains toluene, ethyl acetate, lactol spirits or methylene chloride. The AST capacity is 4,400 gallons. Finished product is pumped into the tank from mixing vessel(s). The finished product is pumped from tank and filled into containers through a closed piping system.

Title V/Major Source Status
HENKEL CORP is subject to Title V requirements. This determination is based on the following information:
This Henkel Corporation facility is considered a major facility for purposes of permitting under Title V of te Clean Air Act because it has potential emissions of VOC, HAPS, and many individual HAPs which are greater than the major source thresholds of 50 tpy, 25 tpy, and 10 tpy, respectively.

Program Applicability
The following chart summarizes the applicability of HENKEL CORP with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO

TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's(hydrofluorocarbons)or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality

standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2851	PAINTS AND ALLIED PRODUCTS
2891	ADHESIVES AND SEALANTS
9999	NONCLASSIFIABLE ESTABLISHMENTS

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorizeprocesses which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-01-014-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PAINT MANUFACTURE General Mixing and Handling
3-01-014-03	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PAINT MANUFACTURE Solvent Loss: General
3-01-018-20	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Polymer Drying
4-90-002-01	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION WASTE SOLVENT RECOVERY OPERATIONS Storage Tank Vent

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air

contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE				
		lbs/yr		Range		
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER		pteyear			Y
000107-21-1	1,2-ETHANEDIOL	pteyear		Y		
000126-99-8	1,3-BUTADIENE, 2-CHLORO-	pteyear		Y		
000085-44-9	1,3-ISOBENZOFURANDIONE	pteyear		Y		
000123-91-1	1,4-DIETHYLENE DIOXIDE	pteyear		Y		
000108-10-1	2-PENTANONE, 4-METHYL	pteyear		Z		
000108-05-4	ACETIC ACID ETHENYL ESTER		pteyear		Y	
007664-41-7	AMMONIA	pteyear		A		
001336-21-6	AMMONIUM HYDROXIDE	pteyear		A		
000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-		pteyear		Y	
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE		pteyear		Z	
000071-36-3	BUTANOL	pteyear		C		
000085-68-7	BUTYL BENZYL PHTHALATE	pteyear		A		
000056-23-5	CARBON TETRACHLORIDE	pteyear		Y		
000067-66-3	CHLOROFORM	pteyear		Y		
000110-82-7	CYCLOHEXANE	pteyear		C		
000075-09-2	DICHLOROMETHANE	pteyear		Z		
000131-11-3	DIMETHYL PHTHALATE	pteyear		Y		
000071-55-6	ETHANE, 1,1,1-TRICHLORO	pteyear		Z		
000075-35-4	ETHENE,1,1-DICHLORO	pteyear		Y		
000106-88-7	ETHYL OXIRANE	pteyear		Y		
000100-41-4	ETHYLBENZENE	pteyear		Z		
000050-00-0	FORMALDEHYDE	pteyear		Y		
0NY100-00-0	HAP	pteyear		F		
000110-54-3	HEXANE	pteyear		Z		
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER		pteyear		Y	
000067-56-1	METHYL ALCOHOL	pteyear		Z		
000078-93-3	METHYL ETHYL KETONE	pteyear		Z		
0NY075-00-0	PARTICULATES	pteyear		A		
000108-95-2	PHENOL	pteyear		Y		
0NY075-00-5	PM-10	pteyear		A		
000108-88-3	TOLUENE	pteyear		Z		
0NY998-00-0	VOC	pteyear		G		
001330-20-7	XYLENE, M, O & P MIXT.	pteyear		Z		

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance

certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be

invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 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 this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit

contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, 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.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: **Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: **Federally Enforceable Requirements - 40 CFR 70.6(b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: **General Provisions for State Enforceable Permit Terms and Condition -**

6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	44	Powers and Duties of the Department with respect to air pollution control
0-01001	40CFR 63-HHHHH.8005(a)	39	Miscellaneous Organic Coating Mfg. NESHAP - Emission Limits
0-01331	40CFR 63-HHHHH.8005(a)	40	Miscellaneous Organic Coating Mfg. NESHAP - Emission Limits
FACILITY	40CFR 63-HHHHH.8005(d)(4)	30	Process vessel requirements
FACILITY	40CFR 63-HHHHH.8005(g)	31	Miscellaneous Coating Mfg. NESHAP - Flow Indicators
FACILITY	40CFR 63-HHHHH.8015	32	Miscellaneous Coating Mfg. NESHAP - Equipment Leaks
FACILITY	40CFR 63-HHHHH.8030	33	Miscellaneous Coating Mfg. NESHAP - Heat Exchanger Provisions
FACILITY	40CFR 63-HHHHH.8075(e)	34	Miscellaneous Coating Mfg. NESHAP - Compliance reports
FACILITY	40CFR 63-HHHHH.8095	35	Miscellaneous Coating Mfg. NESHAP - General Provisions
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
FACILITY	6NYCRR 201-1.4	45	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	

FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 36, 37	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	
FACILITY	6NYCRR 201-6.5(a)(7)	2	
FACILITY	6NYCRR 201-6.5(a)(8)	16	
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)	24	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	17	
FACILITY	6NYCRR 201-6.5(e)	6	
FACILITY	6NYCRR 201-6.5(f)	25	
FACILITY	6NYCRR 201-6.5(f)(6)	18	
FACILITY	6NYCRR 201-7.1	26, 38	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	46	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 212.10(c)(1)	29	NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 212.4(c)	27	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6(a)	28	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215	9	
0-01901	6NYCRR 229.3(e)(2)(iv)	41	Volatile organic liquid storage tanks
0-01901/0038X/977/T077A	6NYCRR 229.3(e)(2)(v)	42	Volatile organic liquid storage tanks
0-01901/0038X/980/T080A	6NYCRR 229.3(e)(2)(v)	43	Volatile organic liquid storage tanks
FACILITY	6NYCRR 231-2	26	New Source Review in Nonattainment Areas and Ozone Transport Region

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-3.3(a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)
This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and the notification and reporting of permit

deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR Part 201-6.5(c)(3)(ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2
This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3
This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, HENKEL CORP has been determined to be subject to the following regulations:

40CFR 63-HHHHH.8005 (a)
This rule contains the emission limits for the different miscellaneous mixing equipment subject to Subprat HHHHH.

40CFR 63-HHHHH.8005 (d) (4)
This rule contains provisions for performance tests after a change in operations.

40CFR 63-HHHHH.8005 (g)
This rule contains requirements for flow indicators.

40CFR 63-HHHHH.8015
This rule contains monitoring requirements regarding equipment leaks for facilities subject to Subpart HHHHH.

40CFR 63-HHHHH.8030
This rule contains the heat exchanger provisions for facilities subject to Subpart HHHHH.

40CFR 63-HHHHH.8075 (e)
This rule lists the items required to be included in the compliance report for Subpart HHHHH.

40CFR 63-HHHHH.8095
This rule states where to locate a listing of the Subpart A general provisions that apply to Subpart HHHHH.

6NYCRR 201-6.5 (f)
This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 201-7.1
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6NYCRR 212 .10 (c) (1)
Reasonably available control technology compliance plans for major facilities. The compliance plan must identify reasonably available control technology (RACT) for each emission point which emits nitrogen oxides for major nitrogen oxide facilities or volatile organic compounds for major volatile organic compound facilities. The compliance plan must identify the emission points which do not employ reasonably available control technology (RACT), and a schedule for implementation of RACT must be included in the plan.

6NYCRR 212 .4 (c)
This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 229 .3 (e) (2) (iv)
This section requires a tank with submerged fill for storage of volatile organic liquids

6NYCRR 229 .3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6NYCRR 231-2
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Compliance Certification
Summary of monitoring activities at HENKEL CORP:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
0-01001	39	monitoring of process or control device parameters as surrogate
0-01331	40	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	26	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	record keeping/maintenance

		procedures
0-01901	41	record keeping/maintenance procedures
0-01901/0038X/977/T077A	42	record keeping/maintenance procedures
0-01901/0038X/980/T080A	43	record keeping/maintenance procedures

Basis for Monitoring

Most of the monitoring requirements contained in this permit are based on specific monitoring methods and observations as prescribed in the applicable rules. Facility specific monitoring conditions were written to assure that reliable information is obtained representing the facility's compliance status for the following issues:

Conditions #5, 6, 24 are standard conditions which detail recordkeeping and reporting requirements specific to Title V permits.

Condition #7 requires the annual submission of an emission statement which inventories all facility emissions.

Condition #25 details the facility's Operational Flexibility Plan.

Condition #26 caps the VOC emissions to less than 39 tons during any consecutive 12 month period for Process 210.

Condition #27 contains a particulate limit in terms of grain loading for sources in emission units 0-01041, 0-01042, and 0-01043. Henkel is required to conduct observations of visible emissions from the facility on a weekly basis.

Condition #28 contains the opacity monitoring requirements for sources in emission units 0-01041, 0-01042, and 0-01043. Henkel is required to conduct observations of visible emissions from the facility on a weekly basis. Opacity is limited to no more than 20%.

Condition #29 states that since the mixers in emission units 0-01001 and 0-01331 are subject to 40CFR 63 Subpart HHHHH in addition to 6NYCRR Part 212.10 and the control requirements of Subpart HHHHH are stricter than those required under Part 212.10, compliance with Subpart HHHHH ensures compliance with Part 212.

Condition #34 states the contents of the compliance report required for compliance with 40CFR 63 Subpart HHHH.

Condition #40 states that each portable process vessel must be equiped with a cover or lid that must be in place at all times when the vessel contains a HAP, except for material additions and sampling.

Condition #41states that storage tanks subject to 6NYCRR Part 229, with a capacity greater than or equal to 10,000 gallons but less than 20,000 gallons, must be equipped with submerged fill.

Condition #42 states that storage tanks subject to 6NYCRR Part 229, with a capacity less than 10,000 gallons, must be equipped with a conservation vent.