

# Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Sauder Woodworking Company (Archbold Container)		
Premise Number	0326000160		
Number of Non-insignificant Emissions Units	1		
What makes this facility a Title V facility?	VOC		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes		

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
N/A			

**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							
P701	2.53 lb VOC/hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- (1) only employee EPS thermoplastic polymer/co-polymer that has pentane as the sole blowing agent; (2) use of EPS thermoplastic polymer/co-polymer beads with a total VOC weight percentage of 6.5 or less; (3) total weight percent of VOC retained in all final EPS products is at an absolute minimum of 1.8%; (4) maximum hourly raw EPS bead throughput shall not exceed 8200 lbs/hr, based on a daily average; (5) maximum annual raw EPS bead throughput shall not exceed 15,558 tons per rolling 12 month period; (6) monitoring of thermal incinerator temperature; and (7) monitoring of collection system pressure drop range.
P701	255.22 tons VOC/rolling 12 month period (stack and fugitive emissions)	31-05(D)		Y	Y	Y	Y	N	N	OR- (1) only employee EPS thermoplastic polymer/co-polymer that has pentane as the sole blowing agent; (2) use of EPS thermoplastic polymer/co-polymer beads with a total VOC weight percentage of 6.5 or less; (3) total weight percent of VOC retained in all final EPS products is at an absolute minimum of 1.8%; (4) maximum hourly raw EPS bead throughput shall not exceed 8200 lbs/hr, based on a daily average; (5) maximum annual raw EPS bead throughput shall not exceed 15,558 tons per rolling 12 month period; (6) monitoring of thermal incinerator temperature; and (7) monitoring of collection system pressure drop range.  ET- No emissions testing is necessary to show compliance because the allowable is based on the emissions unit's potential-to-emit.

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.