

# Statement of Basis For Title V Permit (revised 12/24/02)

Company Name	<b>Sauder Manufacturing Company - Stryker Plant</b>		
Premise Number	<b>03-86-00-0042</b>		
Number of Non-insignificant Emissions Units	<b>9</b>		
What makes this facility a Title V facility?	<b>VOC, HAP</b>		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	<b>Yes</b>		

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
general statement on compliance with applicable requirements (paragraph 1)		40 CFR 63, Subpart JJ	The applicable requirements are 40 CFR 63, Subpart JJ and 40 CFR 63, Subpart A, as identified in Table 1 of Subpart JJ.
work practice implementation plan (paragraph 2)		40 CFR 63.803	The work practice implementation plan addresses the work practice standards under 40 CFR 63.803.
recordkeeping requirements (paragraph 3)		40 CFR 63.806	Includes recordkeeping requirements associated with work practice implementation plan.
reporting requirements (paragraph 4)		40 CFR 63.807	Includes semiannual reporting requirements associated with work practice implementation plan.

**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.
  
- ? 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							
R001, R002, R003, R005, R006, R007, R008, Z006	none	21-07 (G)(2)		Y	N	Y	Y	N	N	OR - The permittee is restricted from using any coating or cleanup material which is a photochemically reactive material. M - No monitoring requirements are necessary to show compliance. ET - Because the permittee is restricted from using photochemically reactive material, no testing is required.
R001, R002, R003, R006, R007, R008	1.0 lb VHAP/lb solids (for coatings)		40 CFR 63.802 (a)(1)	Y	N	Y	Y	Y	N	OR - The permittee shall only use coatings that comply with the applicable VHAP limitation. M - No monitoring requirements are necessary to show compliance. ET - VHAP emissions are based on VHAP content recorded in certified product data sheets. Special conditions apply to emissions of formaldehyde and styrene.
R001, R002, R003, R006, R007, R008	10.0% VHAP by weight (for thinners)		40 CFR 63.802 (a)(1)	Y	N	Y	Y	Y	N	OR - The permittee shall only use thinners that comply with the applicable VHAP limitation. M - No monitoring requirements are necessary to show compliance. ET - VHAP emissions are based on VHAP content recorded in certified product data sheets.
R001, R002, R003, R005, R006, R007, R008	work practice implementation plan		40 CFR 63.803	Y	N	Y	Y	N	N	The work practice implementation plan is specified under Part II. OR - There are some operational restrictions within the work practice implementation plan. M - No monitoring requirements are necessary to show compliance. ET - No testing is required to demonstrate compliance for any work practice.
R005	1.8 lbs VHAP/lb solids (for foam adhesives)		40 CFR 63.802 (a)(2)(i)	Y	N	Y	Y	Y	N	OR - The permittee shall only use coatings that comply with the applicable VHAP limitation. M - No monitoring requirements are necessary to show compliance. ET - VHAP emissions are based on VHAP content recorded in certified product data sheets. Special conditions apply to emissions of formaldehyde and styrene
Z007	none	17-11(B)		N	N	N	N	N	N	Particulate emissions (PE) limitation under this rule is not applicable due to uncontrolled PE less than 10 lbs/hr and location of facility.
Z007	none	17-07(A)		N	N	N	N	N	N	Visible PE limitation under this rule is not applicable due to no PE limitation under OAC rule 3745-17-11(B).

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
R001, R002, R003, R006, R007, R008	<u>lbs OC/hr, tons OC/yr (for coatings):</u>  23,2, 101.6 (R001)  20.1, 88.0 (R002)  7.41, 32.5 (R003, R006, R007, R008)	31-05 (PTI 03- 11296)		N	N	N	N	N	N	These hourly and annual OC emission limitations are based on the emissions unit's potential to emit. Monitoring, recordkeeping, and reporting are not needed to demonstrate compliance.  ET - If required, compliance with the hourly allowable OC emission limitation shall be determined in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A.
R001, R002, R003, R006, R007, R008	<u>lbs OC/month, tons OC/yr (for cleanup):</u>  104.6, 0.63 (R001)  107.6, 0.65 (R002)  15.7, 0.094 (R003, R006, R007, R008)	31-05 (PTI 03- 11296)		N	N	Y	Y	N	N	M - No monitoring requirements are necessary to show compliance. ET - OC emissions are based on OC content of cleanup materials. Formulation data or Method 24 shall be used to determine the OC content.
R001, R002, R003, R006, R007, R008	129.6 tons OC/yr (combined limit for coatings and cleanup for these EUs))	31-05 (PTI 03- 11296)		N	N	Y	Y	Y	N	This limitation is a rolling 12-month summation of the monthly OC input rates for the affected EUs in order to avoid PSD review for VOC. M - No monitoring requirements are necessary to show compliance. ET - OC input rates are based on OC content of coatings and cleanup materials. Formulation data or Method 24 shall be used to determine the OC content
R001, R002, R003, R006, R007, R008	<u>lbs PE/hr, tons PE/yr:</u>  0.62, 2.72 (R001)  0.91, 4.0 (R002)  0.086, 0.38 (R003, R006, R007, R008)	31-05 (PTI 03- 11296)		Y	N	Y	Y	N	N	OR - The permittee is required to operate the dry filtration system whenever the emissions unit is operating. M - No monitoring requirements are necessary to show compliance. ET - Hourly PE is estimated using a calculation of solids overspray and percent control. If required, the test method and procedures of OAC rule 3745-17-03(B)910) shall be used to demonstrate compliance. Annual PE is based on hourly PE limitation times 8760 hour/year. Therefore, compliance with the annual limitation will be shown upon compliance with the hourly limitation.
R001, R002, R003, R006, R007, R008	20% opacity	31-05 (PTI 03- 11296)		Y	N	N	N	N	N	OR - The permittee is required to operate the dry filtration system whenever the emissions unit is operating. M - No monitoring requirements are necessary to show compliance. ET - If required, compliance shall be demonstrated in accordance with the method in OAC rule 3745-17-03(B)(1).

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

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

Misc = miscellaneous requirements

**Instructions for Part III:**

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

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

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

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

- ? 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.