

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Sauder Woodworking Company		
Premise Number	0326000160		
Number of Non-insignificant Emissions Units	59		
What makes this facility a Title V facility?	PE and VOC		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes		

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

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							
P100, P201, P203, P207, P300, P301, P302, P310, P311, P312, P318, P500, P501, P502, P505, P506	0.0042 gr PE/dscf	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P100, P201, P203, P207, P300, P301, P302, P310, P311, P312, P318, P500, P501, P502, P505, P506	0.0030 gr PM ₁₀ /dscf	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.

P200, P202, P204, P205, P206, P303, P304, P305, P306, P307, P308, P309, P313, P314, P317, P400, P401, P402, P403, P404, P405, P406, P407, P408, P503, P504, P507, P508, P509, P510, P511, P514, P515, P516, P517, P518	0.0042 gr PE/dscf		Y	Y	Y	Y	Y	Y	Y	N	Other- 40 CFR Part 52.21 and OAC rule 3745-31-10 through 31-20 OR- Monitoring of baghouse pressure drop range is required.
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P200, P202, P204, P205, P206, P303, P304, P305, P306, P307, P308, P309, P313, P314, P317, P400, P401, P402, P403, P404, P405, P406, P407, P408, P503, P504, P507, P508, P509, P510, P511, P514, P515, P516, P517, P518	0.0030 gr PE/dscf		Y	Y	Y	Y	Y	Y	Y	N	Other- 40 CFR Part 52.21 and OAC rule 3745-31-10 through 31-20 OR- Monitoring of baghouse pressure drop range is required.
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P100, P200, P201, P202, P203, P204, P205, P206, P207, P300, P301, P302, P303, P304, P305, P306, P307, P308, P309, P310, P311, P312, P313, P314, P317, P318, P400, P401, P402, P403, P404, P405, P406, P407, P408, P500, P501, P502, P503, P504, P505, P506, P507, P508, P509, P510, P511, P514, P515, P516, P517, P518	5% opacity as a 6-minute average	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- The M/R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
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P100	1.09 lbs PE/hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P100	4.75 TPY PE	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P100	0.78 lb PM ₁₀ /hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P100	3.42 TPY PM ₁₀	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P201	0.87 lb PE/hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P201	3.80 TPY PE	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P201	0.62 lb PM ₁₀ /hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P201	2.72 TPY PM ₁₀	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P203	0.43 lb PE/hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P203	1.89 TPY PE	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P203	0.31 lb PM ₁₀ /hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P203	1.36 TPY PM ₁₀	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P200, P202, P204, P206	0.73 lb PE/hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.

P200, P202, P204, P206	3.20 TPY PE		Y	Y	Y	Y	Y	Y	N	N	Other- 40 CFR Part 52.21 and OAC rule 3745-31-10 through 31-20 OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P200, P202, P204, P206	0.52 lb PM ₁₀ /hr	31-05(A)(3)		Y	Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P200, P202, P204, P206	2.28 TPY PM ₁₀		Y	Y	Y	Y	Y	Y	N	N	Other- 40 CFR Part 52.21 and OAC rule 3745-31-10 through 31-20 OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P205	0.87 lb PE/hr	31-05(A)(3)		Y	Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P205	3.81 TPY PE		Y	Y	Y	Y	Y	Y	N	N	Other- 40 CFR Part 52.21 and OAC rule 3745-31-10 through 31-20 OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P205	0.62 lb PM ₁₀ /hr	31-05(A)(3)		Y	Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P205	2.72 TPY PM ₁₀		Y	Y	Y	Y	Y	Y	N	N	Other- 40 CFR Part 52.21 and OAC rule 3745-31-10 through 31-20 OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P207	0.14 lb PE/hr	31-05(A)(3)		Y	Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P207	0.61 TPY PE	31-05(A)(3)		Y	Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P207	0.103 lb PM ₁₀ /hr	31-05(A)(3)		Y	Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P207	0.45 TPY PM ₁₀	31-05(A)(3)		Y	Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.

P300, P301, P310, P400, P405, P500, P501, P502, P503, P518	1.80 lbs PE/hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P300, P301, P310, P400, P405, P500, P501, P502, P503, P518	7.88 TPY PE	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P300, P301, P310, P400, P405, P500, P501, P502, P503, P518	1.29 lbs PM ₁₀ /hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P300, P301, P310, P400, P405, P500, P501, P502, P503, P518	5.65 TPY PM ₁₀	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.

P302, P303, P304, P305, P306, P307, P308, P309, P311, P312, P313, P314, P317, P401, P402, P403, P404, P406, P407, P408, P504, P505, P506, P507, P508, P509, P510, P511, P514, P515, P516, P517	2.59 lbs PE/hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
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P303, P304, P305, P306, P307, P308, P309, P313, P314, P317, P401, P402, P403, P404, P406, P408, P504, P507, P508, P514, P515, P516, P517	11.34 TPY PE		Y	Y	Y	Y	Y	N	N	Other- 40 CFR Part 52.21 and OAC rule 3745-31-10 through 31-20 OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P302, P311, P312, P407, P505, P506, P509, P510, P511	11.35 TPY PE	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.

P302, P303, P304, P305, P306, P307, P308, P309, P311, P312, P313, P314, P317, P401, P402, P403, P404, P406, P407, P408, P504, P505, P506, P507, P508, P509, P510, P511, P514, P515, P516, P517	1.85 lbs PM ₁₀ /hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
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P302, P303, P304, P305, P306, P307, P308, P309, P311, P312, P313, P314, P317, P401, P402, P403, P404, P406, P407, P408, P504, P505, P506, P507, P508, P509, P510, P511, P514, P515, P516, P517	8.10 TPY PM ₁₀	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P316	2.9 lbs VOC/ gallon coating, excluding water and exempt solvents	21-09(F)		N	Y	Y	Y	N	N	ET-Calculations based on VOC content and gallon usage are sufficient to show compliance.
P318	0.14 lb PE/hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.
P318	0.59 TPY PE	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P318	0.096 lb PM ₁₀ /hr	31-05(A)(3)		Y	Y	Y	Y	Y	N	OR- Monitoring of baghouse pressure drop range is required.

P318	0.42 TPY PM ₁₀	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- No emissions testing is required. Allowables are based on the emissions unit's potential-to-emit. Compliance is demonstrated through calculations.
P512	0.36 lb OC/hr	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- No emissions testing is necessary to show compliance because allowable is based on emissions unit's potential-to-emit.
P512	1.6 TPY OC	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- No emissions testing is necessary to show compliance because allowable is based on emissions unit's potential-to-emit.
P513	0.014 lb OC/hr	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- No emissions testing is necessary to show compliance because allowable is based on emissions unit's potential-to-emit.
P513	0.06 TPY OC	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- No emissions testing is necessary to show compliance because allowable is based on emissions unit's potential-to-emit.
P801	6.80 lbs OC/hr	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- No emissions testing is necessary to show compliance because allowable is based on emissions unit's potential-to-emit.
P801	29.90 TPY OC	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- No emissions testing is necessary to show compliance because allowable is based on emissions unit's potential-to-emit.
P801, P802	1.0 lb VHAP/lb solids		Y	N	Y	Y	Y	N	N	Other- 40 CFR Part 63, Subpart JJ ET- The M, R, Rp requirements are sufficient to show compliance.
R201	20% opacity as a 6-minute average	17-07(A)		Y	Y	Y	Y	N	N	OR- Monitoring of baghouse pressure drop range is required. ET- The M/R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
R201	93.6 lbs OC/day from coatings	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- The M/R & Rp requirements are sufficient to demonstrate compliance.
R201	17.1 TPY OC from coatings	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- The M/R & Rp requirements are sufficient to demonstrate compliance.
R201	2.15 lbs PE/hr	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of dry filtration system. ET- No emissions testing is necessary to show compliance because allowable is based on emissions unit's potential-to-emit.
R201	9.4 TPY PE	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of dry filtration system. ET- No emissions testing is necessary to show compliance because allowable is based on emissions unit's potential-to-emit.

R201	Maximum daily coating usage shall not exceed 10 gallons of coating in any one day for the coating of metal and nonmetal parts	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- The M/R & Rp requirements are sufficient to demonstrate compliance.
R201	147.2 lbs OC/month from cleanup materials	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- The M/R & Rp requirements are sufficient to demonstrate compliance.
R201	0.88 TPY OC from cleanup materials	31-05(A)(3)		Y	Y	Y	Y	N	N	OR- Use of non-photochemically reactive materials. ET- The M/R & Rp requirements are sufficient to demonstrate compliance.
P319										No applicable requirements.

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

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, 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.

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.

