

# Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	CFF of Avery Dennison
Premise Number	02-43-08-1207
Number of Non-insignificant Emissions Units	2
What makes this facility a Title V facility?	Vinyl Acetate (HAP)
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			

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**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.

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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							
K001, and K002	2.9 lbs VOC/gal of coating, excluding water and exempt solvents	21-09 (F)	N	N	Y	Y	Y	N	N	No testing required. Record keeping is sufficient to determine in compliance.
K001, and K002	0.20 kg VOC/kg of coating solids applied	N	Y	N	Y	Y	Y	N	N	Basis - 40 CFR Part 60, subpart RR No testing required. Record keeping is sufficient to determine in compliance.
K001	99 tons/yr of VOC	31-05	N	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-3703. No testing required. Record keeping is sufficient to determine in compliance. OR - (a) monthly VOC emission limitation, with R and Rp requirements. (b) CAM rule is not currently applicable.
K001		N	Y	N	Y	Y	Y	Y	N	Basis - 40 CFR Part 63, subpart KK. The permittee has chosen to exclude this emissions unit, which is used primarily for coating, laminating, or other operations, from this rule, the printing and publishing MACT by using less 5% by weight of total materials in product and packaging rotogravure work stations in each month.
K002	18.5 lbs/hr of VOC	31-05	N	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-8503. No testing required. Record keeping is sufficient to determine in compliance.
K002	1.5 lbs/hr of NOx	31-05	N	Y	N	N	N	N	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-8503. OR - Use of low NOx burners all the time when K002 is in operation. Compliance is determined based upon AP-42 emission factor and maximum hourly gas burning capacity.
K002	0.62 lb/hr of O <sub>3</sub>	31-05	N	N	N	N	N	N	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-8503. Compliance is determined based upon emission factor, by manufacturer’s internal stack tests, and 15 kW/corona treater, and total 3 corona treaters.

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

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**Instructions for Part III:**

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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.

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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.

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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.