



State of Ohio Environmental Protection Agency

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08/31/00

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

02-43-11-0099  
FFD/MFD/STD of Avery Dennison  
James E Fear  
Avery Dennison  
7590 Auburn Road  
Painesville, OH 44077

Dear James E Fear:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

**If you have any questions or comments concerning this draft Title V permit, please contact Northeast District Office.**

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA  
Jim Orlemann, DAPC Engineering  
Michael Ahern, DAPC PMU  
Northeast District Office  
Pennsylvania



## Ohio EPA

State of Ohio Environmental Protection Agency

### TITLE V PERMIT

Issue Date: 08/31/00

### DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

FFD/MFD/STD of Avery Dennison  
Avery Dennison  
7590 Auburn Road  
Painesville, OH 44077

of a Title V permit for Facility ID: 02-43-11-0099

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

K001 (R-1 Coater)

R-1 Coater - Pressure Sensitive Coater, Drying Ovens & R-1 Corona Treater

K002 (R-2 Coater)

R-2 Coater - Pressure Sensitive Coater, Drying Ovens & R-2 Corona Treater (New Installation in 1996-1997)

P052 (Compounding Mixers & Weigh Stations)

215-1 Compounding Mixer, 215-1 Weigh Station, 215-2 Compounding Mixer, & 215-2 Weigh Station

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

# **PART I - GENERAL TERMS AND CONDITIONS**

## **A. State and Federally Enforceable Section**

### **1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
  - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting

requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## **4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

## **6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen 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 the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program 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, and shall not require a reopening of this permit.

- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

## **11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to

the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
- ii. Compliance certifications shall include the following:
  - (a) An identification of each term or condition of this permit that is the basis of the certification.
  - (b) The permittee's current compliance status.
  - (c) Whether compliance was continuous or intermittent.
  - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
  - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

### **15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

## **16. Off Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

## **17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

## **B. State Only Enforceable Section**

### **1. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

## **6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

## **7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## **8. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforcable Section

1. This Title V permit is one of three which constitutes the entire Title V permit for this facility (ID number 02 43 11 0099), located on Chester Street in Lake County. The three are classified presently as follows:

Avery MFD, Reflective Division, Building #7;

Avery PFF or FFD, the P-coaters, Building #3; and

Avery STD, the I coaters, Building #5.

This permit is for Avery MFD, Reflective Division, building #7 on Chester Street in Painesville, Ohio.

2. K001(R-1 coater) at this facility is part of a netting, synthetic minor permit to install (#02-8665), issued January 19, 1995, with K015 (P-7) at FFD, and the following is the synthetic minor determination which was included in that permit to install.

The permittee proposed to install K015 (the P-7 pressure sensitive adhesive coater) at their Chester Street facility in Painesville, Ohio.

At the time of the proposed installation, Lake County was nonattainment for ozone. Since the proposed potential emissions from the new coater (K015) exceeded 40 tons per year and the facility was major, the installation of the new coater would have been a major modification and would have required the permittee to comply with the Emission Offset Interpretation Policy (40 CFR, Part 51, Appendix S). Through the netting process, the permittee was able to avoid these requirements.

The permittee proposed to restrict the annual VOC content of the coatings applied on line K015 to 1,354 tons per year by accepting monthly cumulative emission limitations in the first year and an annual rolling 365-day summation in subsequent years, such that the annual VOC emissions would not exceed 131 tons per year. Due to the wide variety of coatings and products and the unpredictable nature of the operation, this would be tracked and enforced through daily record keeping and quarterly reporting of coating usage and emissions.

The permittee also proposed to limit the emissions from K001 (the R-1 Reflective Coater) to 153 tons of VOC per year. The old allowable emission rate for K001 was 290.78 tons of VOC per year. (The allowable emission rate was used because it was less than the actual emission rate. K001 had been part of a federally approved bubble with three other coaters at the facility. These four emissions units, in total, had complied with the 2.9 pounds of VOC per gallon of coating [excluding water and exempt solvents] RACT limitation.)

To accomplish the emission reductions, K001 was equipped with a thermal incinerator with an overall reduction efficiency of at least 88.7%. Further, the coating usage in K001 was restricted to no more than 1,354 tons per year.

Two other contemporaneous emission increases at the facility included the installation of a pilot coater (emissions unit K014) and the I-5 coating line (emissions unit K016) at Avery Specialty Tape Division.

Permit to install #02-4109 (issued on July 31, 1989 and modified on February 2, 1992) allowed K014 to emit 6.75 tons of VOC per year.

Permit to install #02-7206 (issued on June 16, 1994) allows the I-5 coater (Ohio EPA source number 0243110099 K016) to emit up to 39.0 tons of VOC per year.

**A. State and Federally Enforcable Section (continued)**

The following table summarizes the netting:

|  |              |
|--|--------------|
| K001(R-1) allowable emissions (prior to installation of incinerator, in tons/year) | 290.78       |
| K001(R-1) allowable emissions (after installation of incinerator, in tons/year)    | 153.00       |
| K001(R-1) contemporaneous decrease, in tons  | -137.78      |
| K014(pilot coater) contemporaneous increase, in tons                               | 6.75         |
| K016(I-5 coater) contemporaneous increase, in tons                                 | 39.00        |
| K015(P-7) potential to emit (with enforceable operating restrictions),in tons      | 131.00       |
| <b>NET EMISSIONS INCREASE IN TONS</b>  | <b>38.97</b> |

Therefore, because the net emissions increase was less than 40 tons per year, the installation of K015 was not considered a major modification under the definition in 40 CFR, Part 51.

In addition, the allowable emission rate for emissions unit K001 is 153 tons per year, on a rolling 365-day basis.

**B. State Only Enforceable Section**

1. The following insignificant emissions units are located at this facility:

B017-1.18 MMBTU/HR Natural Gas Boiler  
P053-The 215-1 Metallizer  
P054-The 215-1QA Lab Hood  
Z701-Compounding Churns 215-1  
Z702-Compounding Churns 215-2  
Z703-Small Parts Wash Tank 215-1  
Z704-Small Parts Wash Tank 215-2  
Z705-Small Parts Wash Tank 215-3  
Z706-Wash Tank 215-4  
Z707-Bench Top Exhaust 215-1  
Z708-The R-2 Wash Tank #1  
Z709-The R-2 Wash Tank #2

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** R-1 Coater (K001)

**Activity Description:** R-1 Coater - Pressure Sensitive Coater, Drying Ovens & R-1 Corona Treater

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u>   | <u>Applicable Rules/ Requirements</u>   | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|---|--|
| R-1 Coater, Drying Ovens and R-1 Corona Treater with Hirt Thermal Oxidizer ( Building #7), EPA unit number K001 | OAC rule 3745-21-09 (F)   | Except for the coatings that are not vented to the thermal oxidizer (water and emulsion based coatings), the emission limitation specified by this rule is less stringent than the limits established pursuant to PTI #02-8665.  |
|   | OAC rule 3745-31-05 (D), PTI # 02-8665 (Netting with P-7, EPA emissions unit K015 of PFF, Building #3 ) | For the coatings that are not required to be vented to the thermal oxidizer (water and emulsion based coatings), the VOC content of the coatings shall not exceed 2.9 lbs per gallon coating applied, excluding water and exempt solvents.<br><br>90% overall reduction of VOC ( 100% capture and 90% destruction) when employing solvent based coatings (see A.I.2.a).<br><br>153 tons per year VOC, on a rolling 365-day basis, from all coatings. |

##### 2. Additional Terms and Conditions

- 2.a A solvent based coating is any coating that has a VOC content greater than 2.9 pounds per gallon of coating, as applied, excluding water and exempt solvents.
- 2.b The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

## II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The thermal oxidizer control system shall be designed and operated according to good engineering practices and the manufacturer's specifications.
3. The permittee shall limit coating usage so that the amount of VOC applied is no more than 153 tons of VOC per rolling 365-day period, according to PTI # 02-8665 netting restrictions.
4. The coating line shall be vented to the thermal oxidizer during all solvent based coating operations.
5. The permittee shall properly maintain and operate the LEL units in the bypass stack to ensure that no emissions from solvent based coatings go directly to the ambient air.
6. During the required use of the thermal oxidizer, the permittee shall ensure that any inline bypass that could divert solvent laden air from each coating applicator to the ambient air is kept in a closed position.

In addition, any device in the bypass stack that measures VOC concentration or temperature change or some other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

7. Based on the application for this emissions unit, this coating line shall be enclosed such that all VOC emissions are captured, contained and vented to the thermal oxidizer. Compliance with the following criteria, identified by USEPA method 204, shall be met by the permittee:
  - a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
  - b. The total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
  - c. The average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure.
  - d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.
  - e. All VOC emissions, except for those resulting from emulsion and water based coatings, must be captured and vented to the thermal oxidizer.
8. The PTE shall be maintained under negative pressure at a minimum differential pressure of 0.007 inch of water as a three-hour average, at all times when the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - b. All periods of time during which solvent based coatings were employed and any of the emissions from the solvent based coatings were not vented to the thermal oxidizer.
  - c. A log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the following information daily for all coatings employed in this emissions unit that are vented to the thermal oxidizer:
    - a. The name and identification number of each coating, as applied.
    - b. The VOC content of each coating in pounds per gallon of coating, excluding water and exempt solvents, as applied.
    - c. The number of gallons of each coating employed, excluding water and exempt solvents.
    - d. The total uncontrolled VOC emissions from all coatings employed, in tons (equals VOC applied).
    - e. The calculated, controlled VOC emission rate for all coatings, in tons (the controlled VOC emission rate for the coatings shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance).
3. The permittee shall collect and record daily the following information for all the coatings employed in this emissions unit that are not vented to the thermal oxidizer:
    - a. The name and identification number of each coating applied.
    - b. For each coating, the VOC content in pounds per gallon of coating, excluding water and exempt solvents, as applied, and the number of gallons employed, excluding water and exempt solvents.
    - c. The total VOC emissions from all coatings employed, in tons (equals VOC applied).
4. The permittee shall also record the following information daily:
    - a. The rolling, 365-day summation of the total VOC emissions from all the coatings employed, i.e., A.III.2.e + A.III.3.c, in tons.
    - b. The rolling, 365-day summation of the total VOC applied for all the coatings employed, i.e., A.III.2.d + A.III.3.c, in tons.
5. The permittee shall maintain records of the maintenance and operation of the LEL units which ensure that no emissions from the solvent based coatings go directly to the ambient air, and these records shall be made available to the Director or his representative upon request during normal business hours.

### III. Monitoring and/or Record Keeping Requirements (continued)

6. The presence of VOC in the bypass stack shall be monitored continuously to ensure the use of the thermal oxidizer during the use of solvent based coatings.
7. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously and continuously measure and record the pressure inside and outside of the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
8. Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
  - b. All periods of time during which the stack that bypasses the thermal oxidizer is used to bypass emissions while solvent based coatings are employed.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC usage limitation of 1354 tons for all the coatings employed.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the 365-day VOC emission limit of 153.0 tons for all the coatings employed.
4. The permittee shall submit annual reports that specify the total VOC emissions and the total VOC usage for this emissions unit. These reports shall be submitted by January 31 of each year.
5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the VOC content of any coating employed exceeds the applicable limitation of 2.9 lbs of VOC per gallon of coating applied, excluding water and exempt solvents, during periods when the VOC emissions are not vented to the thermal oxidizer. A copy of the record shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the exceedance occurred.
6. The permittee shall submit quarterly deviation (excursion) reports that identify all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a three-hour average.

### V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for all coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
2. Emission Limitation:  
  
90% overall VOC reduction by weight (100% capture and 90% destruction)  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C).

**V. Testing Requirements (continued)**

**3. Emission Limitation:**

153.0 tons VOC per year based on a rolling 365-day summation

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of Section A.III.2 and 3 of these terms and conditions.

**4. Emission Limitation:**

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, for the coatings that are not vented to the thermal oxidizer.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of Section A.III.3.

**5.a Emission testing requirements**

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted by no later than November 1, 2002 and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the destruction efficiency limitation for VOC of 90%.

iii. The following test methods shall be employed to demonstrate compliance with the destruction efficiency limitation for VOC:

Method 25 of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are less than 50ppm; and

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

**5.b** The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

## V. Testing Requirements (continued)

- 5.c** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA and local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the from the Northeast District Office of the Ohio EPA and the local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northeast District Office of the Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of the Ohio EPA.

## VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| <u>Operations, Property,<br/>and/or Equipment</u> | <u>Applicable Rules/<br/>Requirements</u> | <u>Applicable Emissions<br/>Limitations/Control<br/>Measures</u> |
|---|---|--|
|---|---|--|

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** R-2 Coater (K002)

**Activity Description:** R-2 Coater -Pressure Sensitive Coater, Drying Ovens & R-2 Corona Treater (New Installation in 1996-1997)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u>   | <u>Applicable Rules/ Requirements</u>     | <u>Applicable Emissions Limitations/Control Measures</u>  |
|---|---|---|
| R-2 Coater, Drying Oven, Unwind and Windup Stations, Corona Treater Beading Station with thermal oxidizer (Building #7), EPA unit number K017 | OAC rule 3745-21-09 (F)                   | Except for the coatings that are not vented to the thermal oxidizer (water based and emulsion based coatings), the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 60, Subpart RR. |
|   | 40 CFR Part 60 Subpart RR                 | The emission limitation specified by this rule for the use of the thermal oxidizer is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).  |
|   | OAC rule 3745-31-05(A)(3)<br>PTI #02-9669 | For the coatings that are not vented to the thermal oxidizer (water based and emulsion based coatings), the VOC content of the coatings shall not exceed 0.20 kg VOC/kg of coating solids.<br>8.79 pounds VOC/hr, including cleanup materials.                    |
|   |   | 38.50 tons VOC, including cleanup materials, per calendar year.<br><br>99.6% overall VOC reduction by weight (100% capture and 99.6% destruction) when employing solvent based coatings (see A.I.2.c).  |

## 2. Additional Terms and Conditions

- 2.a This emissions unit is a pressure sensitive, adhesive, solvent based, paper coating line including coating stations, drying ovens, unwind and windup stations, and a corona treater. It is located in Building # 7 of the Marking Films Division. The maximum capacity of the coating line, based upon the current worst case VOC-containing coating and the maximum line speed and coating coverage, is 9,633.37 tons of VOC in a year.
- 2.b The permittee shall maintain a permanent total enclosure, that complies with the requirements in Reference Method 204 (40 CFR Part 51, Appendix M), to capture the VOC emissions from this emissions unit whenever this emissions unit is in operation.
- 2.c A solvent based coating is any coating that has a VOC content greater than 0.20 kg per kg of solids, as applied.

## II. Operational Restrictions

- 1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. This emissions unit shall be totally enclosed such that all the VOC emissions are captured. Compliance with the following criteria, identified by USEPA Method 204, shall be met by the permittee:
  - a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Director and Administrator.
  - b. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
  - c. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.
  - d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.
  - e. All VOC emissions, except for those resulting from emulsion and water based coatings, must be captured and vented to the thermal oxidizer.
- 3. The thermal oxidizer control system shall be designed and operated according to good engineering practices and manufacturer's specifications.
- 4. The permittee shall properly maintain and operate the LEL units in the bypass stack to ensure that no emissions from solvent based coatings go directly to the ambient air.
- 5. During the required use of the thermal oxidizer, the permittee shall ensure that any inline bypass that could divert solvent laden air from each coating applicator to the ambient air is kept in a closed position.

In addition, any device in the bypass which indicates VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

- 6. The permittee shall limit coating usage so that the amount of VOC applied from the coatings is no more than 9633.37 tons per year.
- 7. The PTE shall be maintained under negative pressure at a minimum differential pressure of 0.007 inch of water as a three-hour average, at all times when the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emission unit was in compliance.
  - b. A log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. In accordance with the 1998 Avery Dennison preventive maintenance plan, the permittee shall inspect weekly all lines between the total enclosure of the head of the coater and the thermal oxidizer for escaping VOC emissions and maintain records of the results of the inspections.
  3. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously and continuously measure and record the pressure inside and outside of the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. The permittee shall collect and record the following information daily for all coatings employed in this emissions unit that are not vented to the thermal oxidizer:
    - a. The name and the identification number of each coating.
    - b. The VOC content in kilogram of VOC per kilogram of coating solids, as applied, the volume solids content, as applied, and the volume as applied, of each coating.
    - c. The total VOC emissions from all coatings employed, in pounds (equals VOC applied).

### III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall collect and record the following information daily for all coatings and associated cleanup materials employed in the emissions unit that are vented to the thermal oxidizer:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, excluding water and exempt solvents, as applied, in pounds per gallon.
  - c. The number of gallons of each coating employed, excluding water and exempt solvents.
  - d. The name and identification of each cleanup material employed.
  - e. The number of gallons of each cleanup material employed.
  - f. The VOC content of each cleanup material, in pounds per gallon.
  - g. The total uncontrolled VOC emissions from all coatings and from all cleanup materials employed, in tons (equals VOC applied).
  - h. The calculated, controlled VOC emission rate for all coatings, in pounds (the controlled VOC emission rate for the coatings shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance).
  
6. The permittee shall collect and record the following information daily for all coatings and cleanup materials employed in this emissions unit:
  - a. The total VOC emissions, in pounds, i.e., A.III.4.c. + A.III.5.h.
  - b. The total operating hours of the coating line.
  - c. The average hourly VOC emission rate, in pounds/hr (a/b).
  
7. The permittee shall maintain records of the maintenance and operation of the LEL units which ensure that no emissions from solvent based coatings go directly to the ambient air, and these records shall be made available to the Director or his representative upon request during normal business hours.
  
8. The presence of VOC in the bypass stack shall be monitored continuously to ensure the use of the thermal oxidizer during the use of solvent based coatings.
  
9. Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, does not comply with the temperature limitation specified above.
  - b. Any incidences where the stack that bypasses the thermal oxidizer is used to bypass emissions while solvent based coatings are employed.

#### IV. Reporting Requirements (continued)

2. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the VOC content of any coating employed exceeds the applicable limitation of 0.20 kg of VOC per kg of solids applied, during periods when the VOC emissions are not vented to the thermal oxidizer. A copy of the record shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the exceedance occurred.
3. The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly VOC emissions exceeded 8.79 pounds per hour, and the actual average hourly VOC emissions for each such day.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a three-hour average.

#### V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for all coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**2.a** Emission Limitation:

99.6% overall VOC reduction by weight (100% capture and 99.6% destruction)

Applicable Compliance Method:

Performance testing shall be conducted within 3 months after issuance of this permit, and within 6 months prior to permit expiration, using the following methods: 40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M, Method 204.

Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C).

**2.b** Emission Limitation:

0.20 kilogram of VOC per kilogram of solids as applied

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of Section III.4 of this permit.

**2.c** Emission Limitation:

8.79 lbs VOC/hr on a daily average basis

Applicable Compliance Method: Compliance shall be based on the record keeping requirements in Section A.III.4, 5, and 6 of these terms and conditions.

## V. Testing Requirements (continued)

### 2.d Emission Limitation:

38.5 tons per calendar year including cleanup materials

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of Section A.III.4, 5 and 6 of these terms and conditions and shall be the sum of the daily values for A.III.6, divided by 2000.

### 3.a Emission testing requirements

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the 99.6% destruction efficiency limitation for VOC.

iii. The following test methods shall be employed to demonstrate compliance with the destruction efficiency limitation for VOC:

Method 25 of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are less than 50ppm; and

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

**3.b** The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

**3.c** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA and local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the from the Northeast District Office of the Ohio EPA and local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northeast District Office of the Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from from the Northeast District Office of the Ohio EPA.

Facility Name: **PFF/MFD/STD of Avery Dennison**

Facility ID: **02-43-11-0099**

Emissions Unit: **R-2 Coater (K002)**

## **VI. Miscellaneous Requirements**

1. The calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.
2. The permittee shall employ the plan for preventive maintenance and repair of leaks within the solvent capture and destruction system submitted to the Ohio EPA on August 10, 1998.

Equipment subject to the plan shall include all ductwork from the enclosures of the heads of the coaters to the thermal oxidizer, the ovens and the thermal oxidizer fan cover.

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| <u>Operations, Property,<br/>and/or Equipment</u> | <u>Applicable Rules/<br/>Requirements</u> | <u>Applicable Emissions<br/>Limitations/Control<br/>Measures</u> |
|---|---|--|
|---|---|--|

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Compounding Mixers & Weigh Stations (P052)

**Activity Description:** 215-1 Compounding Mixer, 215-1 Weigh Station, 215-2 Compounding Mixer, & 215-2 Weigh Station

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u>                                   | <u>Applicable Rules/ Requirements</u>      | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|--|--|
| Compounding Mixers 215-1 and 215-2; Weigh Stations 215-1 and 215-2, Building #7 | OAC rule 3745-21-07(G)(2)                  | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
|   | OAC rule 3745-31-05(A)(3)<br>PTI # 02-7430 | 1.25 pounds per hour OC<br>30.0 pounds per day OC<br>5.48 tons per year OC<br>See A.2.a.   |

##### 2. Additional Terms and Conditions

- Monitoring and/or record keeping requirements for organic compounds are not required by this permit. Based on the maximum capacities of all the equipment and an estimate of the total OC emissions using emission factors from AP-42, Section 4.6 on solvent degreasing, the actual organic compound emissions could not exceed the allowable emission rates from this rule.

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

None

##### IV. Reporting Requirements

None

## V. Testing Requirements

### 1. Emission Limitation

5.48 tons of OC per year

Applicable Compliance Method

Because this limit was established by multiplying the short-term limit of 1.25 lbs OC/hour by 8760 hours of operation per year, compliance with the annual limit is assumed providing that compliance with the hourly limit is maintained.

### 2. Emission Limitation

30 lbs OC per day

Applicable Compliance Method

Because this limit was established by multiplying the short-term limit of 1.25 lbs OC/hour by 24 hours of operation per day, compliance with the daily limit is assumed providing that compliance with the hourly limit is maintained.

## V. Testing Requirements (continued)

### 3. Emission Limitation:

1.25 pounds OC per hour

Applicable Compliance Method:

The weigh stations are treated as cold cleaners with agitation. The emission factor, derived using AP-42, 5th edition, 1981, Section 4.6 on Solvent Degreasing, and adding a 50% increment to allow for agitation, is 0.12 lb/hr-ft<sup>2</sup>.

The mixers for mixing polyester solution, ester pigment and glycol cellulose are treated as polymer blending operations associated with the production of neoprene. The emission factor is obtained from the AirChief CDROM database, Version 2.0 Beta, April 1992, and is based on a review of air emissions generated by polychloroprene manufacturing prepared for the Industrial Environmental Research Laboratory (IERL) of the USEPA by Monsanto Research Corporation. The associated reference is titled "Source Assessment: Polychloroprene, State of the Art," December, 1977. The emission factor is 0.42 lb VOC(OC) emitted per ton blended.

A maximum of 19.2 batches can be processed per day.  
The maximum weight per batch is 311.3 pounds.

The daily OC emissions are calculated as follows:

$(0.12 \text{ lb/hr-ft}^2) \times (1 \text{ hr/batch}) \times (\text{Number of batches for open-top drums}) \times (3.69 \text{ ft}^2) + (0.42 \text{ lb/ton}) \times (\text{Number of batches for open-top drums}) \times (311.3 \text{ lbs/batch}) =$

$( (0.12 \text{ lb/hr-ft}^2) \times (1 \text{ hr/batch}) \times (19.2 \text{ batches/day}) \times (3.69 \text{ ft}^2) ) + ( (0.42 \text{ lb/ton}) \times (19.2 \text{ batches/day}) \times (311.3 \text{ lbs/batch}) \times (1 \text{ ton}/2000 \text{ lbs}) ) = 9.76 \text{ lbs/day}$

$9.76 \text{ lbs/day} \times (1 \text{ day}/24 \text{ hours}) = 0.41 \text{ lbs per hour}$

where, open top drums with a diameter of 26 inches, and a surface area of 3.62 ft<sup>2</sup> and maximum weight capacity of 311.3 pounds per batch are used.

Because these organic compound emissions were calculated based on maximum capacities and design of all equipment, allowables cannot be exceeded as described in Section A.I.2.a.

## VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| <u>Operations, Property,<br/>and/or Equipment</u> | <u>Applicable Rules/<br/>Requirements</u> | <u>Applicable Emissions<br/>Limitations/Control<br/>Measures</u> |
|---|---|--|
|---|---|--|

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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