

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Avery Dennison, PFF, Building #3, the Pcoaters		
Premise Number	02 43 11 0099		
Number of Non-insignificant Emissions Units	4 (four)		
What makes this facility a Title V facility?	VOC		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes		

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

- **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							
K015 (P-7)	0.20kgVO C per kg solids (emulsion or water based coatings)		40 CFR Part 60, Subpa rt RR	n	y	y	y	n	n	
K006- K008 (P-3 P-4, P-5)	2.9 lbs VOC per gallon (water or emulsion based coating)	3745- 21- 09(F)		n	y	y	y	n	n	
K006- K008 (P-3 P-4, P-5)	81% overall reduction by weight (90% destruction)	3745- 21- 09(B)(6)		y	y	y	y	y	y	OR: Proper use of bypass stack, operation (including temperature) of TOX to achieve the limit, use of permanent total enclosures Misc: Availability of calculations to support compliance determination, preventive maintenance for VOC leaks to assure continuance of total enclosure; maintenance of the Damper Monitoring System
K015 (P-7)	98% overall VOC reduction by weight (98% destruction and 100% capture) except for emulsion based	3745- 31- 05(D)		y	y	y	y	y	y	This emissions unit was netted with another coater through synthetic minor permit # 02-8665 OR: Proper use of bypass stack, operation (including temperature) of TOX to achieve the limit, use of permanent total enclosures Misc: Availability of calculations to support compliance determination, preventive maintenance for VOC leaks to assure continuance of total enclosure; maintenance of the Damper Monitoring System
K015 (P-7)	129 tons VOC per rolling 365 day period		3745- 31- 05(D)	y	y	y	y	y	y	This emissions unit was netted with another coater through synthetic minor permit # 02-8665 OR: Proper use of bypass stack, operation (including temperature) of TOX to achieve the limit, use of permanent total enclosures Misc: Availability of calculations to support compliance determination; maintenance of the Damper Monitoring System

K015 (P-7)	81 pounds of VOC per hour on a daily average basis		3745- 31- 05(D)	y	y	y	y	y	y	This emissions unit was netted with another coater through synthetic minor permit # 02-8665 OR: Proper use of bypass stack, operation (including temperature) of TOX to achieve the limit, use of permanent total enclosures Misc: Availability of calculations to support compliance determination; maintenance of the Damper Monitoring System
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EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

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

Misc = miscellaneous requirements

• **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

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

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

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

- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.