

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Avery Dennison, Specialty Tape Division	
Premise Number	02 43 11 0099	
Number of Non-insignificant Emissions Units	Five (5)	
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							
K009 (I-2); K010 (I-3)	2.9 lbs VOC/gal coating (water or emulsion based coating)	3745- 21- 09(F)		n	y	y	y	n	n	OR: Proper use of bypass stack, operation (including temperature) of TOX to achieve the limit, use of total enclosures
K009 (I-2); K010 (I-3)	81 % overall reduction by weight of VOCs(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
K014 (Buildin g #6 coater)	0.20 kg of VOC per kg of solids (emulsion or water based coatings		NSPS, 40 CFR, Part 60, Subpa rt RR	n	y	y	y	n	n	
K014 (Buildin g #6 coater)	98.5 % overall reduction of VOCs	3745- 31- 05(D)		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
K016	0.20 kg of VOC per kg of solids (emulsion or water based coatings)		NSPS, 40 CFR, Part 60, Subpa rt RR	n	y	y	y	n	n	

K016	98.5 % overall reduction of VOCs	3745-31-05(D)		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
P065	1.65 lb/hr 39.6 lbs/day; and 7.23 tons per year VOC	3745-31-05(D)		n	n	n	n	n	n	Both hourly and daily monitoring and/or record keeping requirements for organic compounds are not required by this permit. Based on the maximum capacity of all the equipment and an estimate of 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 based on Best Available Technology.
P071 formerly Z511	8 lbs/hr and 40 lbs/day of OC	3745-21-07(G)(2)		n	n	n	n	n	n	OR: Use of thermal oxidation 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 Monitoring and/or record keeping requirements for organic compounds are not required by this permit. Based on the maximum capacity of the equipment and an estimate of OC emissions based on AP-42, Section 4.8, Tank and Drum Cleaning, the actual organic compound emissions could not exceed the allowable emission rates from this rule.

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.