



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

08/31/00

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

02-43-08-1207
CFF of Avery Dennison
David E Henschel
P.O. Box 8008
Painesville, OH 44077

Dear David E Henschel:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 06/22/00. The comment period has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written or with agreed-upon changes, then you have the opportunity to schedule a meeting with us to discuss your concerns.

Please contact Jim Orlemann, Engineering Section Manager, 614-644-3592, or you can telefax your request to (614) 644-3681, within fourteen (14) days from receipt of this letter if a meeting is desired. If a request for a meeting is not received within fourteen (14) days of receipt of this letter, we will forward this proposed permit (as written, or with agreed-upon changes) to USEPA for approval.

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive, flowing style.

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

cc: Northeast District Office
Becky Castle, DAPC PMU



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Date: 08/31/00

PRELIMINARY PROPOSED

Effective Date:

Expiration Date:

This document constitutes issuance to:

CFF of Avery Dennison
5750 Heisley Road
Mentor, OH 44060

of a Title V permit for Facility ID: 02-43-08-1207

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
K001 (CF-1 Coating Line)
Paper and film coating line

K002 (CF-2 Coating Line)
Paper and film coating line

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

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 Enforceable Section

None

B. State Only Enforceable Section

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

Z001: Adhesive tank
Z002: Adhesive tank
Z003: Adhesive tank
Z004: Adhesive tank
Z005: Adhesive tank
Z006: Adhesive tank
Z007: Adhesive tank
Z008: Waste-water treatment tank
Z009: Waste-water treatment tank
Z010: 4.158 MM BTU/hour plant air heating unit. Heater 1
Z011: 4.455 MM BTU/hour plant air heating unit. Heater 2
Z012: 4.72 MM BTU/hour plant air heating unit. Heater 3
Z013: 4.0 MM BTU/hour plant air heating unit. Heater 4

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: CF-1 Coating Line (K001)
Activity Description: Paper and film coating line

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>
Paper and film coating line, CF - 1	OAC rule 3745-21-09 (F)	The permittee shall not cause, allow or permit the discharge into the ambient air of any volatile organic compounds (VOC) in excess of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-31-05 (A)(3) PTI No. 02-3703	The VOC emissions from coatings and cleanup materials employed in this emissions unit shall not exceed 99 tons per year.
		See section A.II.1 of these terms and conditions.
	40 CFR Part 60 subpart RR	The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.
	40 CFR Part 63, subpart KK	Exempt, see sections A.I.2.a - A.I.2.b and A.III.1 of these terms and conditions.

2. Additional Terms and Conditions

- The permittee has chosen to exclude this emissions unit, which is used primarily for coating, laminating, or other operations, from the 40 CFR Part 63, subpart KK, Printing and Publishing MACT requirements.
- The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by this emissions unit using product and packaging rotogravure work stations in each month shall never exceed five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by this emissions unit in that month, including all inboard and outboard stations.

II. Operational Restrictions

1. For each calendar year of operation, this emissions unit shall be operated so as not to exceed the following maximum year-to-date emission limitations at the end of each month:

Month	Maximum Year-to-Date VOC Emissions (in tons)
January	13
February	25
March	36
April	46
May	55
June	63
July	70
August	76
September	82
October	88
November	92
December	99

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information for five (5) years and submit it to the Administrator of US EPA and/or the Director of Ohio EPA upon request:
 - a. The total mass of each material applied each month in this emissions unit, including all inboard and outboard stations.
 - b. The total mass of all materials applied each month in this emissions unit, including all inboard and outboard stations.
 - c. The total mass of each material applied each month in this emissions unit by product and packaging rotogravure printing work stations.
 - d. The total mass of all materials applied each month on this emissions unit by product and packaging rotogravure printing work stations.
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating and cleanup material, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied.
 - c. The VOC content of each coating (including water and exempt solvents) and cleanup material, in pounds per gallon, as applied.
 - d. The amount of each coating and cleanup material employed, in gallons.
 - e. The total VOC emissions from all coatings and cleanup materials, in tons.
3. Each month, the permittee shall sum the monthly VOC emission rates for the calendar year, and shall maintain a year-to date record of the total VOC emissions from all coatings and cleanup materials for this emissions unit, in tons per year.

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

4. The permittee shall maintain a calendar month record of the following information:
 - a. The name and identification number for each of the coatings used.
 - b. The weighted average of the mass of solvent used per mass of coating solids applied, in kg VOC/kg of coating solids, calculated in accordance with the following:
 - i. The weight fraction of organics and the weight fraction of solids of each coating applied shall be determined by using Reference Method 24 or by the coating manufacturer's formulation data.
 - ii. The weighted average shall be calculated by using the following equation:

$$G = (TWMo) / (TWMs)$$

Where

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month

TWMo = the sum, from $i = 1$ to $i = n$, of $(Woi \times Mci)$

TWMs = the sum, from $i = 1$ to $i = n$, of $(Wsi \times Mci)$

i = subscript denoting an individual coating

n = the number of different coatings

Mci = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records

Woi = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or coating manufacturer's formulation data

Wsi = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or coating manufacturer's formulation data

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07 (A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install No. 02-3703, issued on February 28, 1990: paragraph A.IV.2 in this Title V permit. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) report which include the following information for this emissions unit:
 - a. An identification of each month during which any noncomplying coatings (VOC content exceeded 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents) were employed, and the actual coating content, in pounds of VOC per gallon of coating, excluding water and exempt solvent for each such coating.
 - b. An identification of each month during which the year-to-date VOC emissions from the coatings and cleanup materials exceeded the limitations in section A.II.1 of these terms and conditions, and the actual VOC emissions for each such month.
 - c. An identification of each month during which the mass-weighted average VOC emissions exceeded 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions, in kg VOC/kg of coating solids, for each such month.
3. All deviation (excursion) reports shall be submitted in accordance with section A.1 of the General Terms and Conditions.
4. The permittee shall also submit annual reports of the VOC emissions from this emissions unit. These reports shall include the calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
2.9 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of these terms and conditions. In accordance with OAC rule 3745-21-04 (B)(5), USEPA Method 24 shall be used to determine the VOC content of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, water-based coatings are employed in this emissions unit, GCMS, Capillary Column Technique Method 8260A may be used to determine the VOC content of the water-based coatings. The USEPA issued written approval of this alternative test method on February 11, 1998.

- b. Emission Limitation:
The permittee shall not cause the discharge into the atmosphere more than 0.20 kg VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.3 of these terms and conditions.

- c. Emission Limitation:
99 tons VOC per year from this emissions unit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.3 of these terms and conditions.

2. USEPA Method 24 or GCMS, Capillary Column Technique Method 8260A shall be used to determine the VOC contents of the cleanup materials employed in this emissions unit.

Facility Name: **CFF of Avery Dennison**
Facility ID: **02-43-08-1207**
Emissions Unit: **CF-1 Coating Line (K001)**

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, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: CF-2 Coating Line (K002)

Activity Description: Paper and film coating line

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>
Paper and film coating line with ovens and corona treaters, CF - 2	OAC rule 3745-21-09 (F)	The limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 (A)(3) PTI No 02-8503	18.5 pounds per hour of VOC from coatings and cleanup materials 1.5 pounds per hour of NOx 0.62 pound per hour of Ozone
	40 CFR 60 Subpart RR	See sections A.I.2.a and A.II.1 of these terms and conditions. The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.

2. Additional Terms and Conditions

- 2.a Only emulsions (water based coatings) with a maximum VOC content of 0.043 pound per gallon of coating shall be used in this emissions unit.

II. Operational Restrictions

1. The permittee shall use low NOx burners all the time when this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating and cleanup material, as applied.
 - b. The VOC content of each coating and cleanup material in pounds per gallon, as applied.
 - c. The amount of each coating and cleanup material employed, in gallons per day.
 - d. The total VOC emissions from all coatings and cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall maintain a calendar month record of the following information:
 - a. The name and identification number for each of the coatings used.
 - b. The weighted average of the mass of solvent used per mass of coating solids applied, in kg VOC/kg of coating solid, calculated in accordance with the following:
 - i. The weight fraction of organics and the weight fraction of solids of each coating applied shall be determined by using Reference Method 24 or by the coating manufacturer's formulation data.
 - ii. The weighted average shall be calculated by using the following equation:

$$G = (TWMo) / (TWMs)$$

Where

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month

TWMo = the sum, from i = 1 to i = n, of (Woi x Mci)

TWMs = the sum, from i = 1 to i = n, of (Wsi x Mci)

i = subscript denoting an individual coating

n = the number of different coatings

Mci = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records

Woi = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or coating manufacturer's formulation data

Wsi = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or coating manufacturer's formulation data

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07 (A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install No. 02-8503, issued on February 15, 1995: paragraph A.IV.2 in this Title V permit. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit deviation (excursion) report which include the following information for this emissions unit:
 - a. An identification of each month during which any noncomplying coatings (VOC content exceeded 0.043 pound of VOC per gallon of coating) were employed, and the actual coating content, in pounds of VOC per gallon of coating for each such coating.
 - b. An identification of each day during which the average hourly VOC emissions from this emissions unit exceeded 18.5 pounds per hour, and the actual average hourly VOC emissions from this emissions unit for each such day.
 - c. An identification of each month during which the mass-weighted average VOC emissions exceeded 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions, in kg VOC/kg of coating solids, for each such month.
3. All deviation (excursion) reports shall be submitted in accordance with section A.1 of the General Terms and Conditions.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
18.5 pounds per hour of VOC

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of these terms and conditions.

- b. Emission Limitation:
1.5 pounds per hour of NO_x

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 100 pounds NO_x per million cubic foot of natural gas input, from AP - 42, July 1998, section 1.4, Natural Gas Combustion, by the maximum hourly gas burning capacity (11,373 cubic foot) of this emissions unit.

- c. Emissions Limitation:
0.62 pound per hour of Ozone

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 0.0138 pound Ozone per hour per kW by 15 kW per corona treater, and by 3 corona treaters. The emission factor was determined by the manufacturer's internal stack tests.

- d. Emission Limitation:

The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.2 of these terms and conditions.

- e. Emission Limitation:
0.043 pound VOC per gallon of coating

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section A.III.1 of these terms and conditions.

In accordance with OAC rule 3745-21-04 (B)(5), USEPA Method 24 shall be used to determine the VOC content of the coatings. In accordance with the USEPA's written approval of February 11, 1998, GCMS, Capillary Column Technique Method 8260A may be used to determine the VOC content of the water-based coatings, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A.

2. USEPA Method 24 or GCMS, Capillary Column Technique Method 8260A shall be used to determine the VOC contents of the cleanup materials employed in this emissions unit.

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, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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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