State of Ohio Environmental Protection Agency

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

TELE: (614) 644-3020 **FAX:** (614) 644-2329

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

RE: DRAFT PERMIT TO INSTALL
LAKE COUNTY
Application No: 02-14727

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
40 CFR Part 63 Subpart KK	MACT
40 CFR Part 60 Subpart RR	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 8/7/2001

Avery Dennison, Painesville Fasson Films
Paul Nanney
7600 Auburn Rd
Painesville, OH 44077

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA **NEDO** **PA** **Lake County GHD**

DRAFT PERMIT TO INSTALL 02-14727

Application Number: 02-14727

APS Premise Number: 0243110099

Permit Fee: **To be entered upon final issuance**

Name of Facility: Avery Dennison, Painesville Fasson Films

Person to Contact: Paul Nanney

Address: 7600 Auburn Rd
Painesville, OH 44077

Location of proposed air contaminant source(s) [emissions unit(s)]:
250 Chester St, Building 3
Painesville, Ohio

Description of proposed emissions unit(s):
Modification of emission unit P069 to print onto co-extruded polyethylene film and adhesive.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

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, 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.

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 of federally enforceable 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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 made to the appropriate Ohio EPA District Office or local air agency. 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. See B.10 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. 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 shall be submitted pursuant to 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 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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.

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.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

7. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

10. 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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	33.5

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P069-Modification to the polyethylene (PE) film extruder (E-2 extruder) for co-extrusion of PE film and hot melt adhesive application, and the addition of a flexographic printing station and a forced air dryer	OAC rule 3745-31-05(A)(3)	7.7 pounds per hour of VOC; and 33.5 tons per year of VOC(includes cleanup solvent); 0.42 lb ozone per hour and 1.84 tons per year
	OAC rule 3745-21-09(F)	For non solvent based coatings, the VOC content limitation specified by this rule is less stringent than the VOC content limitation pursuant to 40 CFR Part 60 Subpart RR. See A.2.f.
	OAC rule 3745-21-09(Y)(1)(a)(ii)	VOC content of each ink and coating not to exceed 25% VOC by volume of the volatile matter in the coating and ink, as applied
	40 CFR Part 60 Subpart RR	0.20 kg VOC/kg of coating solids applied for non solvent based coatings. See A.I.2.f.
	40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry)	See Sections II.2 and III.3of the terms and conditions of this permit
	40 CFR Part 63, Subpart JJJJ	See Section IV.2 and IV.3. of the terms and conditions of this permit.

2. Additional Terms and Conditions

2.a This is a permit to install to modify an extruder located at PFF (Painesville Fasson Films) Building #3 to hot melt coat and print flexographically. The emission unit will be operated by the Engineered Films Division.

2.b Coating and ink information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2.c The volatile organic compound content of the hot melt adhesive coatings employed in this emission unit shall be determined in accordance with OAC rule 3745-21-10(B).

2.d VOC content, excluding water and exempt solvents, shall be determined as described in Ohio EPA Engineering Guide #48.

2.e Because the ozone limitation in this permit is based on the maximum potential production and design of this emissions unit, monitoring and recordkeeping is not required.

2.f A solvent based coating is any coating that has a VOC content greater than 0.20 kg per kg of solids.

II. Operational Restrictions

1. The volatile organic compound content of the coatings and inks employed in the printing station of this emission unit shall not exceed 25% VOC by volume of the volatile matter in the coating and ink.

2. The permittee shall operate this emissions unit such that the sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other material applied at product and packaging flexographic work stations, including all inboard and outboard stations, in each month never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied at all coating stations in the emissions unit in that month, as described in Section 63.821(A) of 40 CFR.

In the event that the % of the total mass as described above is in excess of 5%, this coating line shall no longer be exempted from 40 CFR Part 63, Subpart KK.

III. Monitoring and/or Recordkeeping Requirements

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

a. The company identification for each coating, ink and cleanup material employed;

b. The number of gallons of each coating and ink and cleanup material employed;

c. the VOC content of each coating, in kg/kg of coating solids, as applied;

d. The organic compound content of each coating, ink and cleanup material, in pounds per gallon excluding water and exempt solvents; see A.2.d

e. The total organic compound emissions for all coatings, inks and cleanup materials, in pounds per day.

f. the total daily operating hours.

g. the average daily emissions of organic compounds in pounds per hour.

h. the sum of daily emissions of VOC in tons per year.

2. The permittee shall collect and record the following information each month for the printing station:

a. the name and identification of each coating and ink , as applied.

b. the VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,\ 6}$].

3. The permittee shall maintain records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f).

In order to qualify for the exemption from the MACT requirements as described in 63.821(a)(2)(ii)(A), the permittee shall maintain the following records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f)(1) and (f)(2) for five years and submit them to the Director upon request:

a. the total mass of all materials including inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers and other material applied at product and packaging rotogravure or flexographic stations in each month, including all inboard and outboard stations; and

b. the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers and other material applied at all coating stations in the emissions unit each month; and

c. the % of the total mass of all materials applied in the emissions unit that is applied at the product and packaging flexographic work stations, i.e., a/b x 100%.

d. confirmation that this coater is stand alone equipment as defined in the rule.

IV. Reporting Requirements

1. The permittee shall notify the Northeast District Office of the Ohio EPA, in writing of any daily and or monthly record showing that the VOC content of any non solvent based coating exceeded the applicable limitation of 0.20 kg per kg of coating solids as applied , and any noncomplying inks or any exceedance of any other limitation in this permit. The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month.

2. Within 120 days after promulgation of 40 CFR 63 Subpart JJJJ, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report:

a. the name and mailing address of the permittee;

b. the physical location of the source if it is different from the mailing address;

c. identification of the relevant MACT standards and the permittee's compliance date;

d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

3. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR 63 Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

a. the methods used to determine compliance;

b. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart JJJJ;

e. an analysis demonstrating whether the affected source is a major source or an area source;

f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

g. a statement of whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart JJJJ.

V. Testing Requirements

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

   Emission Limitation

   VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied

   Applicable Compliance Method

   Compliance shall be based on the record keeping requirements specified in Section III of this permit. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

2. Emission Limitation

   0.20 kg of VOC per kg of solids of coating

   Applicable Compliance Method

   Compliance with the above limitation shall be determined by the record keeping in Section III of this permit.

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

3. Emission Limitation

   7.7 pounds per hour of volatile organic compounds, including cleanup

   Applicable Compliance Method

   Record keeping as required in Section III of this permit.

4. Emission Limitation

33.5 tons per year of organic compounds, including cleanup

Applicable Compliance Method

Compliance shall be based on summing daily VOC emissions, recorded in Section C of the permit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P069 - Modification to the E-2 extruder with the addition of a hot melt adhesive applicator, ink/coating application equipment (flexographic printing station and a forced air dryer)	Air Toxic Policy	See B.III.1. of these terms and condtions

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for the modification of this emissions unit, P069 was evaluated based on the actual materials (inks, coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

a. Pollutant: triethanolamine

TLV (mg/m3): 5.0 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 1.72 lbs/hr

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3):	48.3 ug/m3
MAGLC (ug/m3):	119 ug/m3

b.

Pollutant :	methanol
TLV (mg/m3):	262 mg/m3
Maximum Hourly Emission Rate (lbs/hr):	0.27 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	7.6 ug/m3
MAGLC (ug/m3):	6,238 ug/m3

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

i. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

ii. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

iii. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 02-14727 Facility ID: 0243110099

FACILITY NAME Avery Dennison Specialty Tape Division

FACILITY DESCRIPTION Modification of emission unit P069 to print onto co-extruded polyethylene film and adhesive

CITY/TWP Painesville

SIC CODE 2672 SCC CODE 4-02-013-03 EMISSIONS UNIT ID P069 mod

EMISSIONS UNIT DESCRIPTION Modification to the E-2 extruder with the addition of a hot melt adhesive applicator, ink/coating application equipment (flexographic printing station and a forced air dryer)

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	att				
PM_{10}					
Sulfur Dioxide	att				
Organic Compounds	att	7.7 lbs/hr	33.5 tpy	7.7	33.5
Nitrogen Oxides	att				
Carbon Monoxide	att				
Lead	att				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 63 Subpart KK NESHAP? 40 CFR Part 60 Subpart RR PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT includes compliance with the Air Toxics Policy and 7.7 lbs/hr and 33.5 tons per year and compliance with 3745-21-09, NSPS and applicable MACT standards

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: ethanol, triethanolamine, ammonia, methanol

NEW SOURCE REVIEW FORM B

PTI Number: 02-14727 Facility ID: 0243110099

FACILITY NAME Avery Dennison Specialty Tape Division

FACILITY DESCRIPTION Modification of emission unit P069 to print onto co-extruded polyethylene film and adhesive

CITY/TWP Painesville

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☒	0000000**c**.wpd	☐	
Modeling form/results	☐	0000000**s**.wpd	☒	☐
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☐
BAT Study	☐	0000000**b**.wpd	☐	☐
Other/misc.	☐	0000000**t**.wpd	☐	☐

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☐ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

NEW SOURCE REVIEW FORM B

PTI Number: 02-14727 Facility ID: 0243110099

FACILITY NAME Avery Dennison Specialty Tape Division

FACILITY DESCRIPTION	Modification of emission unit P069 to print onto co-extruded polyethylene film and adhesive	CITY/TWP	Painesville

Pollutant	Tons Per Year
VOC	33.5

C:\temp\permits3\4870.wpd

NEW SOURCE REVIEW FORM B

PTI Number: 02-14727 Facility ID: 0243110099

FACILITY NAME	Avery Dennison Specialty Tape Division		
FACILITY DESCRIPTION	Modification of emission unit P069 to print onto co-extruded polyethylene film and adhesive	CITY/TWP	Painesville

C:\temp\permits3\4870.wpd