



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 30, 2009

RE: CERTIFIED WARNING LETTER (CWL) RELATED
TO A RELEASE OF UNACCEPTABLE LEVELS OF
VOC FROM POSITIVE PRESSURE LOCATIONS OF
COATING LINE I-10, OHIO EPA EMISSIONS UNIT
ID K005.
FACILITY ID NUMBER: 0243081177

CERTIFIED MAIL

Mr. Mark Pohovey
Regional Operations Manager
Avery Dennison Corporation
Specialty Tape Division
250 Chester St., Bldg. 5
Painesville, Ohio 44077

Dear Mr. Pohovey:

I am writing to you concerning a violation listed in the Avery Dennison first quarter deviation report for 2009 for the I-10 coater of Building #19 at 7100 Lindsay Drive in Mentor. The violation involved unacceptable levels of VOCs (greater than 100 ppm) from the positive pressure locations of the lines between the permanent total enclosure (100% capture of VOCs) of the I-10 coater and the RTO as described in PTI 02-22438, issued final on August 14, 2007.

In accordance with Part III.A.II.5, an operational restriction of the terms and conditions for K005 is stated as follows:

"The concentrations of VOC emissions for this emissions unit, determined in accordance with the leak monitoring program currently used at Building 5 for the permanent total enclosure, shall not exceed 100 ppm, by volume."

The first quarter deviation report submitted by Avery Dennison indicates a VOC concentration of 3338 ppm on the date of March 10, 2009.

Comments included: "there was a greater volume of recirculation air entering the ovens than the RTO blower could take away, thus the positive pressure.... Currently back into compliance...Long term controls, looking at upgrading the magnehelic gauges for the ovens and relay it back to the PLC."

MR. MARK POHOVEY
JUNE 30, 2009
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There is no indication in the report of the conclusive cause of the violation, nor a corrective action to prevent its reoccurrence. Please send to this agency **within 2 weeks** of the receipt of this CWL, a compliance plan including the cause and corrective action(s) to prevent the reoccurrence. Included in the compliance plan shall be some sort of means and a schedule to determine if the violation returns and continues. This agency is suggesting a monitoring schedule of VOC emissions at a minimum of every week for the entire third quarter of 2009.

Failure to comply with the above mentioned request may result in the referral of this violation to our central office for enforcement.

Continued excursions/violations such as those listed above, will result in a Notice of Violation (NOV) and possibly subsequent enforcement action.

Please note that nothing in this letter, including the submission of the requested information, constitutes a waiver of Ohio EPA's authority to seek civil penalties for this or any other violations as provided in ORC 3704.06 or for the U.S. EPA to seek civil penalties pursuant to federal law. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

Sincerely,



Nancy Meli
Environmental Specialist
Division of Air Pollution

NM:bo

pc: Tim Fischer, DAPC, NEDO

ec: Dennis Bush, DAPC, NEDO
Ed Fasko, DAPC, NEDO