



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-1280

937-225-4435 — Fax: 937-225-3486

www.rapca.org

March 25, 2013

Certified Mail

Avery Dennison, Printer System Division

John Hussman

170 Monarch Lane

Dayton, OH 45342

**RE: Excess Emissions from air emissions unit P018
Avery Dennison, Printer Systems Division
Ohio EPA Identification Number 0857090718**

Dear Mr. Hussman:

WARNING LETTER

This letter is in regards to an annual emission limit violation reported by Avery Dennison, Printer System Division (Avery), located at 170 Monarch Lane, Dayton, Ohio, in the calendar year (CY) 2012 annual permit evaluation report (PER) which was received on February 15, 2013. This facility is identified by Ohio EPA Facility ID 0857090718. The violations were documented for Ohio EPA air emissions unit (EU) P018. This letter also serves to address Avery's failure to report any changes to air toxics emissions.

Permit to Install & Operate (PTIO) P0103747 was issued on November 13, 2008 for EU P018 establishing volatile organic compound (VOC) emissions limits, monitoring, record keeping, and reporting requirements.

EU P018 Excess VOC Emissions

1) Pursuant to Emissions Unit Term and Condition C.2.b)(1)a. of PTIO P0103747 for EU P018, the annual emissions of VOC shall not be greater than 4.59 tons per year (TPY). The CY 2012 PER reported an emission rate of 5.68 TPY VOC for EU P018 in violation of PTIO P0103747 for EU P018 and Ohio Revised Code (ORC) 3704.05.

2) Pursuant to Emissions Unit Term and Condition C.2.b)(2) of PTIO P0103747 for EU P018, the hourly VOC emission limit of 1.05 pounds per hour (lbs/hr) was established to reflect potential to emit for this emission unit. Furthermore, the annual VOC emission

limit established in PTIO P0103747 for EU P018 is based on operating at the total hours in a year, 8760 hrs, multiplied by the hourly emission rate, 1.05 lbs/hr, and then divided by 2000 lbs/ton. Based on this assessment and the excess annual emissions reported, Avery is exceeding the hourly emission limit of 1.05 lbs/hr in violation of PTIO P0103747 for EU P018 and ORC 3704.05.

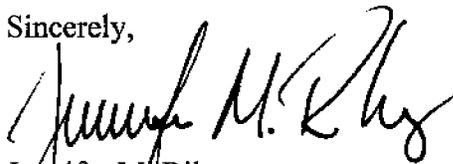
EU P018 Toxic Air Contaminant Statute

Pursuant to Emission Unit Term and Condition C.2.d)(2) of PTIO P0103747 for EU P018, the “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in Ohio Administrative Code (OAC) rule 3745-114-01 and based on the actual materials and design parameters of the emissions unit’s exhaust. Pursuant to Emission Unit Term and Condition C.2.e)(2) Avery is required to submit an annual report by January 31 documenting any changes made to a parameter or value used in the dispersion model that was used to demonstrate compliant with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit or the exhaust stack have been made, then a report shall include a statement to this affect. Avery failed to submit an annual report in violation of PTIO P0103747 for EU P018 and ORC 3704.05.

This letter serves as official notification of the aforementioned emission limit violations and annual reporting requirement for EU P018. The CY 2012 PER identified that the reason for the excess emissions was due to the discovery of additional sources of air emissions associated with EU P018. To resolve the annual emissions violations for EU P018, Avery indicated a PTIO modification application will be submitted to include the additional sources of air pollution. RAPCA requests that Avery submit this application by March 31, 2013 as specified in the CY 2012 PER. The application should also address compliance with the “Air Toxics Contaminant Statute”, ORC 3704.03(F), taking into account changes in the hourly emissions rate of any air toxics contaminants listed in OAC rule 3745-114-01.

RAPCA appreciates Avery’s prompt attention in addressing the emissions violations from EU P018. If you should have any questions please feel free to call me at 225-4438.

Sincerely,



Jennifer M. Riley
Air Pollution Control Specialist II
Abatement Unit

Cc Brian Dickens, U.S. EPA (via e-mail)
Bruce Weinberg, Ohio EPA (via e-mail)
Jefferis Canan, RAPCA (via e-mail)