



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUL 7 4 2013

REPLY TO THE ATTENTION OF:

Matthew Stuckey  
Chief  
Permits Branch  
Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft Title V operating permit renewal, permit number T089-32905-00407, for Avery Dennison MFD, located in Lowell, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) Permit condition E.1.2(d) (permit, page 37) incorporates by reference the compliance provisions of 40 C.F.R. 60 Subpart RR, provided in the regulation at 40 C.F.R. 60.443, that apply to the facility. However, condition E.1.2(d) does not list 40 C.F.R. 60.443(j) as an applicable requirement. 40 C.F.R. 60.443(j) considers startup and shutdown operations to be part of normal operations at this source category and requires including emissions during these operations when determining compliance with the emission standard at 40 C.F.R. 60.442(a)(2). Please add this condition to the permit or explain why this condition should not be included.
- 2.) Condition E.3.2 (permit, page 40) does not include the applicable requirements of 40 C.F.R. 63 Subpart ZZZZ. Please add the applicable requirements to the permit.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico  
Chief  
Air Permits Section