



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

January 6, 2009

RE: **NOTICE OF VIOLATION**
FACILITY ID# 0243081177

CERTIFIED MAIL

Mr. Daniel Jones
Environmental Coordinator
Avery Dennison
203 Chester Street
Painesville, Ohio 44077

Subject: Failure to file Title V Fee Emission Report, calendar year 2007

Dear Mr. Jones:

Pursuant to Ohio Administrative Code (OAC) rule 3745-78-02, any owner or operator of sources subject to OAC rule 3745-77-02 is required to submit a fee emissions report that quantifies that actual emission data for particulate matter, sulfur dioxide, organic compounds, nitrogen oxides, and lead. This fee emissions report was to be submitted by owners or operators of affected facilities by June 6, 2008, for calendar year 2007. The above named facility was sent a Notice of Violation in this matter to Darcy Robison of Avery from the Central Office of Ohio EPA DAPC on October 3, 2008. Attached is a copy of that letter. The letter requested the report be submitted electronically via the eBusiness Center: Air Services within 30 days. In a follow-up phone call on December 24, I spoke to Mark Pohovey of Avery who indicated there was a change in personnel and that this issue would be addressed. You called me on January 5 to indicate that you were not sure what was required, but you were becoming familiar with the eBusiness center. We discussed the confusion as to the status of your facility that may have led to a misunderstanding with those previously handling these issues for the facility. For clarification, Avery Dennison STD became a Title V facility for emission reporting issues as of the issuance of the permit-to-install in 2007 which placed the facility in the Title V category. This is true, even though the installation did not occur until 2008. As stated in the October 3 letter from Central office, a Title V fee report was required by June 6, 2008. As of this date, we have not received the report, and enforcement action will be initiated.

Guidance regarding these requirements and completion of the report may be found on the DAPC web page <http://www.epa.state.oh.us/dapc/> by selecting the topic Air Services.

MR. DANIEL JONES
JANUARY 6, 2009
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Should you have any questions regarding this letter, please feel free to contact me at
330.963.1161

Sincerely,



Ed Fasko
Environmental Supervisor
Division of Air Pollution Control
Northeast District Office

EF:bo

enclosure(s)

pc: Elisa Thomas, DAPC, Central Office
Nancy Meli, DAPC, NEDO