



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TX 75270

May 6, 2020

VIA EMAIL

Mr. Randy Brown
Plant Manager, West Monroe Packaging Plant #70
Graphic Packaging International, LLC
1500 Riveredge Parkway, Suite 100, 7th Floor
Atlanta, GA 30328
Randy.Brown@graphicpkg.com

Re: Clean Air Act Notice of Violation

Dear Mr. Brown:

The United States Environmental Protection Agency ("EPA") has identified Graphic Packaging International, LLC ("GPI") as having violated the Clean Air Act ("CAA"), 42 U.S.C. § 7401 *et seq.*, and the regulations promulgated thereunder. This Notice of Violation ("Notice") is issued to GPI for violations of the CAA at its Monroe Packaging Plant #70 located at 1070 Jonesboro Road, Monroe LA 71292 ("Monroe Packaging Plant No. 70" or "the Facility"). Specifically, EPA believes that GPI¹ has violated its Title V operating permit and the Louisiana State Implementation Plan ("SIP"). The Notice is issued pursuant to Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), which requires the Administrator of EPA to notify any person in violation of a SIP or permit of the violations. The authority to issue this Notice has been delegated to the Director of the Enforcement & Compliance Assurance Division, EPA Region 6.

On March 18, 2019, EPA conducted an onsite CAA inspection at GPI's Monroe Packaging Plant No. 70. Following the inspection and EPA's public posting of the September 12, 2019 inspection report, GPI provided a written response dated October 2, 2019, to areas of concern noted in the inspection report.

After evaluating GPI's response, we are sending this letter to inform GPI of violations at the Facility of GPI's Title V Operating Permit No. 2160-00008-V6 and SIP provisions discussed below.

¹ Please be advised that some companies may qualify as a "small business" under the Small Business Regulatory Enforcement and Fairness Act (SBREFA). The U.S. Small Business Administration has established a Table of Small Business Size Standards, which can be found at: https://www.sba.gov/sites/default/files/Size_Standards_Table.pdf. The SBREFA Information Sheet provides information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. The SBREFA Information Sheet can be found at: <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100BYAV.PDF?Dockey=P100BYAV.PDF>.

Statutory and Regulatory Background

No stationary source subject to Title V may operate except in compliance with a Title V permit. *See* 42 U.S.C. § 7661a(a); 40 C.F.R. §§ 70.1(b) and 70.7(b); LAC 33:III.501.C.4 and LAC 33:III.507.B.2. Louisiana issues Title V permits pursuant to its federally-authorized Title V Operating Permits Program. *See* 60 Fed. Reg. 47,296-97 (Sept. 12, 1995) (effective Oct. 12, 1995); 40 C.F.R. Part 70 Appendix A. Unless a term or condition is specifically designated as not being federally enforceable, all terms and conditions of a Title V operating permit are federally enforceable. 40 C.F.R. § 70.6(b); LAC 33:III.501.C.7 and LAC 33:III.507.B.2.

The State of Louisiana has adopted a SIP that has been approved by EPA. 40 C.F.R. Part 52, Subpart T. Pursuant to Louisiana's SIP, regulated sources shall be operated in accordance with all terms and conditions of the source's permit. LAC 33:III.501.C.4. Noncompliance with any term or condition of the permit shall be grounds for enforcement action. *Id.* At the time of the violations identified below, GPI operated the Facility pursuant to Title V Operating Permit No. 2160-00008-V6 (issued April 20, 2017).

CAA Violations

GPI is required to maintain the best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compound emissions. LAC 33:III.2113.A; Specific Requirement 41 of Title V Permit No. 2160-00008-V6; LAC 33:III.501.C.4; and LAC 33:III.507.B.2. GPI failed to maintain the best practical housekeeping and maintenance practices by leaving ink pots containing volatile organic compounds ("VOCs") open to the atmosphere and failing to properly store rags used to clean up spills of ink that contain VOCs.

GPI is required to develop a written plan for housekeeping and maintenance that places an emphasis on the prevention or reduction of VOC emissions from the Facility. *Id.* GPI's written plan for housekeeping and maintenance ("Housekeeping Plan") requires GPI to maintain all training records onsite. GPI failed to maintain 2017 training records onsite as required by its Housekeeping Plan.

Opportunity to Confer

We appreciate GPI working with us regarding this matter. Please contact Carlos Evans, Assistant Regional Counsel, evans.carlos@epa.gov, (214) 665-8184, within ten (10) business days of receipt of this Notice to discuss an administrative path for quick resolution.

EPA acknowledges that the COVID-19 pandemic may be impacting the Monroe Packaging Plant No. 70's business. If that is the case, EPA will consider GPI's specific circumstances in determining an appropriate time to schedule the conference requested by GPI.

Sincerely,

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

cc: Celena Cage, LDEQ (Celena.Cage@la.gov)