



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

July 23, 2020

SENT VIA EMAIL

Laura Lynn Church
Vice President, Assistant General Counsel & Assistant Secretary
Graphic Packaging International, LLC
1500 Riveredge Parkway, Suite 100
Atlanta, Georgia 30328

Email: lauralynn.church@graphicpkg.com

RE: In the Matter of Graphic Packaging International, LLC; Ouachita Parish, LA
CAA-06-2020-3415

Dear Ms. Church,

Please find enclosed a copy of the fully executed Administrative Compliance Order on Consent ("AOC"). Please note the timeframes that apply to Graphic Packaging International, LLC under the AOC.

The EPA acknowledges that the COVID-19 pandemic may impact your business. If that is the case, please contact us regarding any specific issues complying with the AOC and we will consider the specific circumstances in determining an appropriate response. If you have any questions, please contact Carlos Evans, Assistant Regional Counsel, by phone at 214-665-8184 or by email at evans.carlos@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Cheryl T. Seager".

Digitally signed by CHERYL SEAGER
DN: c=US, o=U.S. Government, ou=Environmental
Protection Agency, cn=CHERYL SEAGER,
0.9.2342.19200300.100.1.1=68001003651793
Date: 2020.07.23 14:24:34 -05'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosure (1)

ecc:

Celena Cage, LDEQ (celena.cage@la.gov)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6
BEFORE THE ADMINISTRATOR

In the Matter of:

Graphic Packaging International, LLC
Monroe and West Monroe, Ouachita Parish,
Louisiana

Respondent.

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EPA Docket No. CAA-06-2020-3415

ADMINISTRATIVE COMPLIANCE ORDER ON CONSENT

The following Administrative Compliance Order on Consent (“Consent Order”) is issued pursuant to the authority of Section 113(a)(1) and (3) of the Clean Air Act, 42 U.S.C.

§ 7413(a)(1) and (3) (hereinafter referred to as “CAA” or “the Act”). Section 113(a)(1) and (3) of the Act authorize the Administrator of the United States Environmental Protection Agency (“EPA”) to issue an order requiring compliance to any person whom the Administrator finds to be in violation of: any requirement or prohibition of an applicable implementation plan or permit; and other requirements or prohibitions under the CAA including those under Section 112 of the Act, 42 U.S.C. § 7412, and Title V of the Act, 42 U.S.C. §§ 7661-7661f. The authority to issue this Consent Order has been delegated to the Regional Administrator of EPA Region 6, and re-delegated to the Director of the Enforcement and Compliance Assurance Division, EPA Region 6.

STATUTORY AND REGULATORY BACKGROUND

1. The CAA is designed to protect and enhance the quality of the nation’s air so as to promote public health and welfare and the productive capacity of its population. CAA § 101(b)(1), 42 U.S.C. § 7401(b)(1).

National Emissions Standards for Hazardous Air Pollutants

2. Pursuant to Section 112(c) of the Act, 42 U.S.C. § 7412(c), EPA was required to publish a list of all categories and sub-categories of, *inter alia*, major sources of HAPs. Pursuant to Section 112(d)(1) of the Act, 42 U.S.C. § 7412(d)(1), EPA was required to promulgate regulations establishing emission standards for categories and sub-categories of, *inter alia*, major sources of HAPs.

3. After the effective date of any emission standard, limitation or regulation promulgated pursuant to Section 112 of the Act, 42 U.S.C. § 7412, no person may operate such source in violation of such standard, limitation, or regulation. 42 U.S.C. § 7412(i)(3).

4. Pursuant to Section 112 of the Act, 42 U.S.C. § 7412, EPA promulgated standards for the printing and publishing industry (“Subpart KK”), 61 Fed. Reg. 27140 (May 30, 1996). Subpart KK standards are set forth at 40 C.F.R. Part 63, Subpart KK, 40 C.F.R. §§ 63.820-63.831.

5. Pursuant to 40 C.F.R. § 63.830(b)(6), an owner or operator of an “affected source” under NESHAP Subpart KK shall submit a summary report specified in 40 C.F.R. § 63.10(e)(3) on a semi-annual basis (*i.e.*, once every 6-month period).

6. Pursuant to 40 C.F.R. § 63.10(e)(3)(v), all summary reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate.

7. Pursuant to Table 1 of NESHAP Subpart KK, general provision 40 C.F.R. § 63.9(b)(4)(v) applies to an affected source under NESHAP Subpart KK.

8. Pursuant to 40 C.F.R. § 63.9(b)(4)(v), the owner or operator of an affected source under NESHAP Subpart KK must submit an initial notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after that date.

Louisiana State Implementation Plan

9. Section 109(a) of the Act, 42 U.S.C. § 7409(a), requires the Administrator of EPA to publish national ambient air quality standards (“NAAQS”) for certain pollutants. The NAAQS establish primary air quality standards to protect public health and secondary standards to protect public welfare.

10. To achieve the objectives of the NAAQS and the CAA, Section 110(a) of the Act, 42 U.S.C. § 7410(a), requires each State to adopt a state implementation plan (“SIP”) that provides for the implementation, maintenance, and enforcement of the NAAQS, and submit it to the Administrator of the EPA for approval.

11. The State of Louisiana has adopted a SIP that has been approved by EPA. *See* 40 C.F.R. Part 52, Subpart T.

12. The Louisiana SIP includes LAC 33:III.501.C.4, which requires the owner or operator of a “major source” to operate each source under a permit unless an exemption to the source applies or has been granted in accordance with LAC 33, Part III, Chapter 5. The source shall be operated in accordance with all terms and conditions of the permit. Noncompliance with any term or condition of the permit shall constitute a violation of Chapter 5 and shall be grounds for enforcement action. LAC 33:III.501.C.4 is SIP-approved and became effective on September 6, 2016.

Louisiana Title V Program

13. Pursuant to Section 502(b) of the Act, 42 U.S.C. § 7661a(b), EPA promulgated regulations implementing the requirements of Title V and establishing the minimum elements of a Title V permit program to be administered by any state or local air pollution control agency. 57 Fed. Reg. 32250 (July 21, 1992). These regulations are codified at 40 C.F.R. Part 70.

14. EPA has approved Louisiana's Title V operating permit program ("Title V Program"). 40 C.F.R. Part 70, Appendix A; 60 Fed. Reg. 47,296 (Sept. 12, 1995). LDEQ's approved Title V Program is located at LAC 33, Part III, Chapter 5 and became effective on October 12, 1995.

15. The following permitting procedures are part of Louisiana's Title V Program.

- a. LAC 33:III.501.C.4 requires the owner or operator of a major source to operate each source under a permit unless an exemption to the source applies or has been granted in accordance with LAC 33, Part III, Chapter 5. The source shall be operated in accordance with all terms and conditions of the permit. Noncompliance with any term or condition of the permit shall constitute a violation of Chapter 5 and shall be grounds for enforcement action.
- b. LAC 33:III 507.B.2 requires the owner or operator of a major source to operator the source in compliance with all terms and conditions of the permit. Noncompliance with any federally applicable term or condition of the permit shall constitute a violation of the Clean Air Act and shall be grounds for enforcement action.

16. The following reporting requirements are part of Louisiana's Title V Program.

- a. General Condition K of LAC 33:III.535 requires the permittee to submit, at least semiannually, a report of any required monitoring. The semiannual report shall be certified by a responsible official and submitted to the Office of Environmental Compliance by March 31 for the preceding period encompassing July through December, and by September 30 for the preceding period encompassing January through June.
- b. General Condition M of LAC 33:III.535 requires the permittee to submit compliance certifications required by LAC 33:III.507.H.5 to the administrator as well as the permitting authority. The compliance certifications shall be submitted to the Office of Environmental Compliance by March 31 for the preceding calendar year.

17. EPA is authorized by Section 113 of the Act, 42 U.S.C. § 7413, to take action to ensure that air pollution sources comply with all federally applicable air pollution control requirements. These include requirements promulgated by EPA and those contained in federally enforceable SIPs and Title V programs and permits.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

18. Graphic Packaging International, LLC (“Respondent”) is a limited liability company doing business in the State of Louisiana. Respondent is a “person” within the meaning of Section 113(a) of the Act, 42 U.S.C. § 7413(a), and as defined in Section 302(e) of the Act, 42 U.S.C. § 7602(e).

19. At all times relevant to this Consent Order, Respondent has owned and/or operated:

- a. The paperboard box manufacturing facility located at 1070 Jonesboro Road, West Monroe, Ouachita Parish, LA 71292 (“West Monroe Packaging Plant No. 70”); and
- b. The paperboard beverage cartons and carriers manufacturing facility located at 430 Highway 594, Monroe, Ouachita Parish, LA 71203 (“Monroe Packaging Plant No. 8011”) (together, the “Facilities”).

20. Each of the Facilities is a “major source” within the meaning of: Section 112(a)(1) of the Act, 42 U.S.C. § 7412(a)(1); Section 501(2) of the Act, 42 U.S.C. § 7661(2); 40 C.F.R. § 70.2; and LAC 33:III.502, 81 Fed. Reg. 51341 (SIP-approved, effective September 6, 2016).

21. Each of the Facilities is a “stationary source” within the meaning of Section 112(a)(3) of the Act, 42 U.S.C. § 7412(a)(3), and LAC 33:III.502.

22. At all times relevant to this Consent Order, Tresu Press 2 at the Monroe Packaging Plant No. 8011 was an “affected source” under NESHAP Subpart KK.

23. At all times relevant to the Consent Order, Respondent was required to comply with the Louisiana SIP, including LAC 33:III.501.C.4

24. At all times relevant to this Consent Order, the West Monroe Packaging Plant No. 70 operated under Title V Permit No. 2160-00008-V6 that was issued by LDEQ on or about April 20, 2017.

25. Title V Permit No. 2160-00008-V6 requires, *inter alia*, that Respondent comply with specific requirement ("SR") 41 (LAC 33:III.2113.A). SR 41 requires Respondent to maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping includes, but is not limited to, the practices listed in LAC 33:III.2113.A.1 through A.5. Pursuant to LAC 33:III.2113.A.1 through A.5, good housekeeping shall include, but not be limited to, the following practices.

- a. Spills of volatile organic compounds shall be avoided and clean up of such spills shall employ procedures that reduce or eliminate the emission of volatile organic compounds.
- b. Containers of volatile organic compounds shall not be left open and the contents allowed to evaporate.
- c. Waste materials that contain volatile organic compounds shall be stored and disposed of in a manner that reduces or eliminates the emission of volatile organic compounds
- d. Each facility shall develop a written plan for housekeeping and maintenance that places emphasis on the prevention or reduction of volatile organic compound emissions from the facility. This plan shall be submitted to the Office of Environmental Services upon request. A copy shall be kept at the facility, if practical, or at an alternate site approved by the department.
- e. Good housekeeping shall be determined by compliance with LAC 33:III.2121 (Fugitive Emission Control) and the maintenance and the housekeeping plan required by LAC 33:III.2113.A.4.

26. From April 10, 2017 to November 14, 2018 the Monroe Packaging Plant No. 8011 operated under Title V Permit No. 2160-00623-V0 that was issued by LDEQ on or about April 10, 2017.

27. From November 15, 2018 to date, the Monroe Packaging Plant No. 8011 has operated under Title V Permit No. 2160-00623-V1 that was issued by LDEQ on or about November 15, 2018.

28. Title V Permit Nos. 2160-00623-V0 and 2160-00623-V1 require, *inter alia*, that Respondent comply with the following specific requirements.

- a. SR 32 of Title V Permit No. 2160-00623-V0 and SR 41 of Title V Permit No. 2160-00623-V1 (40 C.F.R. Part 63) state that all affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A, including 40 C.F.R. § 63.9(b)(4)(v).
- b. SR 45 of Title V Permit No. 2160-00623-V0 and SR 53 of Title V Permit No. 2160-00623-V1 (LAC 33:III.535) require Respondent to comply with the Part 70 General Conditions as set forth in LAC 33:111.535, including General Conditions K and M, and the Louisiana General Conditions as set forth in LAC 33:111.537.

29. On March 18-19, 2019, EPA conducted inspections of the West Monroe Packaging Plant No. 70 and the Monroe Packaging Plant No. 8011 to determine compliance with the Act.

30. On August 20 and September 12, 2019, EPA provided inspection reports to Respondent for the West Monroe Packaging Plant No. 70 and the Monroe Packaging Plant No. 8011, respectively.

31. On October 2-3, 2019, Respondent submitted information related to the West Monroe Packaging Plant No. 70 and Monroe Packaging Plant No. 8011 inspections.

32. Based on information obtained during the inspections and the information provided by Respondent, EPA Region 6 notified Respondent and LDEQ of Louisiana SIP and other violations at the West Monroe Packaging Plant No. 70 on May 7, 2020 and the Monroe Packaging Plant No. 80 on May 12, 2020.

33. On May 18, 2020, Respondent and EPA Region 6 conferred regarding Louisiana SIP and other violations.

34. EPA has conducted a comprehensive review of the information obtained during the inspection and submitted by Respondent.

35. Based on its comprehensive review of information referenced in Paragraphs 29, 31 and 33, EPA makes the following finding regarding the West Monroe Packaging Plant No. 70: Respondent violated SR 41 of Title V Permit No. 2160-00008-V6 (LAC 33:III.2113.A), LAC 33:III.501.C.4, and LAC 33:III.507.B.2 by failing to maintain the best practical housekeeping and maintenance practices when (a) handling facility cleaning materials and equipment and (b) maintaining training records according to the facility's housekeeping plan.

36. Based on its comprehensive review of information referenced in Paragraphs 29, 31 and 33, EPA makes the following findings regarding the Monroe Packaging Plant No. 8011:

- a. Respondent violated 40 C.F.R. § 63.9(b)(4)(v), SR 41 of Title V Permit No. 2160-00623-V1, LAC 33:III.501.C4, and LAC 33:507.B.2 by failing to provide EPA with timely notification of the startup of Tresu Press Line 2, which occurred on December 3, 2018 and had a notification deadline of December 18, 2018;
- b. Respondent violated 40 C.F.R. § 63.830(b)(6) (referencing 40 C.F.R. § 63.10(e)(3)) by beginning operations in November 2018 and failing to submit to EPA the timely NESHAP Subpart KK Semi-Annual Summary Report for the semi-annual period starting in July 2018 and ending in December 2018 (*i.e.*, 2H 2018);
- c. Respondent violated General Condition K of LAC 33:III.535, SR 45 of Title V Permit No. 2160-00623-V0, LAC 33:III.501.C4, and LAC 33:III.507.B.2 by failing to submit to EPA timely Title V Semi-Annual Monitoring Reports from April 2017 through the semi-annual period ending in June 2018 (*i.e.*, 1H 2017, 2H 2017, 1H 2018); and
- d. Respondent violated General Condition M of LAC 33:III.535, SR 45 of Title V Operating Permit No. 2160-00623-V0, LAC 33:III.501.C4, and LAC 33:III.407.B.2 by failing to timely submit to EPA the Title V Annual Compliance Certification for the 2017 calendar year.

37. On October 2-3, 2019, Respondent provided information to EPA that it has taken corrective action measures at the Facilities to address compliance issues discovered by EPA's review. Specifically, Respondent provided the following: photographs of closed ink pots that were previously observed open to demonstrate compliance with the requirement that containers

of volatile organic compounds shall not be left open and the contents allowed to evaporate; an updated startup notification letter that provided the actual startup date for Tresu Press Line 2; and retroactive Title V Semi-Annual Monitoring Reports and Title V Annual Compliance Certifications that account for missed reporting.

38. More than thirty (30) days before the issuance of this Consent Order, Respondent was notified of the violations alleged herein. On May 7 and 12, 2020, Respondent and the State of Louisiana were notified of the violations alleged herein, in accordance with Section 113(a)(1) of the Act, 42 U.S.C. § 7413(a)(1).

39. All parties to this Consent Order agree that an opportunity to confer has been satisfied in accordance with Section 113(a)(4) of the Act, 42 U.S.C. § 7413(a)(4).

40. The parties further agree that in order to avoid protracted litigation, and in the best interest of all the parties and the environment, this Consent Order will be entered into on consent and by mutual agreement of the parties.

41. Only for the purposes of this proceeding, including any subsequent proceeding by EPA to enforce this document, Respondent admits the jurisdictional allegations contained herein; however, Respondent neither admits nor denies the specific findings of fact and conclusions of law contained in this Consent Order.

42. Respondent also consents to and agrees not to contest EPA's jurisdiction to either issue this Consent Order or enforce its terms. Further, Respondent will not contest EPA's jurisdiction to either compel compliance with this Consent Order in any subsequent enforcement proceedings, whether administrative or judicial, or require Respondent's full compliance with the terms of this Consent Order or impose sanctions for violations of this Consent Order.

Respondent consents to the terms of this Consent Order.

ORDER ON CONSENT

43. Section 113(a)(1) of the Act, 42 U.S.C. § 7413(a)(1), provides in pertinent part that the Administrator may issue an order requiring compliance with any requirement of a state implementation plan. Pursuant to this authority, EPA has decided to issue this Consent Order after investigating all relevant facts, taking into account Respondent's compliance history and efforts made by Respondent to comply with applicable regulations, and based upon the foregoing Findings of Fact and Conclusions of Law herein.

44. Respondent has consented to, and is hereby ordered to satisfy, the following requirements at each Facility.

- a. Within one year of the Effective Date of this Consent Order, Respondent shall review Housekeeping Plan(s), ensure Housekeeping Plan(s) comply with LAC 33:III 2113, and ensure Respondent complies with Facility's Housekeeping Plan(s), including ensuring that Facility personnel are trained on complying with Housekeeping Plan(s).
- b. Within sixty days of the Effective Date of this Consent Order, Respondent shall conduct the following activities for (1) Semi-Annual Summary Reports that were required by NESHAP Subpart KK from the reporting period beginning in July 2018 (*i.e.*, 2H 2018) through the reporting period beginning in July 2019 (*i.e.*, 2H 2019) and (2) Title V Semi-Annual Monitoring Reports from the reporting period beginning in July 2018 (*i.e.*, 2H 2018) through the reporting period beginning in July 2019 (*i.e.*, 2H 2019):
 - 1) Review each submitted report to ensure that each report was complete; and
 - 2) If a report was not completed or not submitted, then submit the completed report within sixty days of the Effective Date of this Consent Order.
- c. Within one year of the Effective Date of this Consent Order, Respondent shall submit to EPA a certification of completion of the actions described in Paragraph 44, sub-paragraphs a. and b. The signing representative shall be fully authorized by Respondent to make such certification. The certification should include the following statement:

"I certify under penalty of law that I have examined and am familiar with the information submitted in this document and that, based on my inquiry of those

individuals immediately responsible for obtaining the information, I believe that the information is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fines and imprisonment.”

45. The permanent shutdown of West Monroe Packaging Plant No. 70 and the surrender of all permits for that Facility will be deemed to satisfy the requirements of paragraph 44, sub-paragraph a., if the shutdown of that Facility and the surrendering of all permits for that Facility occur within one year of the Effective Date of this Consent Order. The permanent shutdown of that Facility and the surrendering of all permits for that Facility will also be deemed to satisfy the requirements of paragraph 44, sub-paragraph b., if the shutdown of that Facility and the surrendering of all permits for that Facility occur within sixty days of the Effective Date of this Consent Order.

46. Any information or correspondence submitted by Respondent to EPA under this Consent Order shall be addressed to the following:

James Leathers
Enforcement Officer (ECDAT)
Air Toxics Enforcement Section
Enforcement and Compliance Assurance Division
U.S. EPA, Region 6
1201 Elm Street, Suite #500
Dallas, Texas 75270-2102
Email: leathers.james@epa.gov

47. To the extent this Consent Order requires Respondent to submit any information to EPA, Respondent may assert a business confidentiality claim covering part or all of that information, but only to the extent and only in the manner described in 40 C.F.R. § 2.203. EPA will disclose information submitted under a confidentiality claim only as provided in 40 C.F.R. Part 2, Subpart B. *See* 41 Fed. Reg. 36,902 (Sept. 1, 1976). If Respondent does not assert a confidentiality claim, EPA may make the submitted information available to the public without

further notice to Respondent. Emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined in 40 C.F.R. § 2.301.

GENERAL PROVISIONS

48. Pursuant to Section 113(a)(4) of the Act, 42 U.S.C. § 7413(a)(4), this Consent Order shall be effective when fully executed, as set forth below in Paragraph 67, shall not exceed a term of one year, and shall be nonrenewable.

49. The provisions of this Consent Order shall apply to and be binding upon Respondent, its officers, directors, agents, and employees solely in their capacity of acting on behalf of Respondent.

50. Respondent neither admits nor denies any of the factual or legal determinations made by EPA in this Consent Order.

51. The provisions of this Consent Order shall be transferable to any other party, upon sale or other disposition of the Facility. Upon such action, the provisions of this Consent Order shall then apply to and be binding upon any new owner/operator, its officers, directors, agents, employees, and any successors in interest.

52. By signing this Consent Order, the undersigned representative of Respondent certifies that he or she is fully authorized by Respondent to execute and enter into the terms and conditions of this Consent Order and has the legal capacity to bind Respondent to the terms and conditions of this Consent Order.

53. Nothing in this Consent Order shall be construed to prevent or limit EPA's civil and criminal authorities, or that of other Federal, State, or local agencies or departments to obtain compliance, penalties, or injunctive relief under any applicable Federal, State, or local laws or

regulations, including the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.

54. Nothing contained in this Consent Order shall affect the responsibility of Respondent to comply with all other applicable Federal, State, or local laws or regulations, including Section 303 of the Act, 42 U.S.C. § 7603.

55. EPA does not waive any rights or remedies available to EPA for any violations by Respondent of Federal laws, regulations, statutes, or permitting programs.

56. Any and all information required to be maintained or submitted pursuant to this Consent Order is not subject to the Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501 et seq., because it seeks to collect information from specific entities to assure compliance with this administrative action.

57. By signing this Consent Order, Respondent acknowledges that this Consent Order will be available to the public and agrees that this Consent Order does not contain any confidential business information.

58. By signing this Consent Order, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, to the best of its knowledge and belief, truthful, accurate, and complete for each submission, response, and statement. Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.

59. EPA reserves all of its statutory and regulatory powers, authorities, rights, and remedies, both legal and equitable, which may pertain to Respondent's failure to comply with

any of the requirements of this Consent Order. This Consent Order shall not be construed as a covenant not to sue, release, waiver, or limitation of any rights, remedies, powers, and/or authorities, civil or criminal, which EPA has under any statutory, regulatory, or common law authority of the United States.

60. This Consent Order does not resolve any civil or criminal claims of the United States for the violations alleged in this Consent Order; nor does it limit the rights of the United States to obtain penalties or injunctive relief under the Act or other applicable federal law or regulations.

61. Respondent has entered into this Consent Order in good faith without trial or adjudication of any issue of fact or law.

62. Respondent waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this Consent Order, including any right of judicial review under Section 307(b)(1) of the Act, 42 U.S.C. § 7607(b)(1).

63. The parties shall bear their own costs and fees in this action, including attorneys' fees.

64. For the purposes of the identification requirement of Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. § 162(f)(2)(A)(ii), performance of Paragraph 44, sub-paragraph a., is restitution or required to come into compliance with law.

65. The EPA and Respondent agree to the use of electronic signatures for this matter. The EPA and Respondent further agree to electronic service of this Consent Order by email to the following addresses:

To EPA:

evans.carlos@epa.gov

Re: Graphic Packaging International, LLC
Docket No. CAA-06-2020-3415

To Respondent:

lauralynn.church@graphicpkg.com

FAILURE TO COMPLY

66. Failure to comply with this Consent Order may result in an enforcement action for appropriate injunctive relief as well as civil penalties pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413(b) or, in appropriate cases, criminal penalties.

EFFECTIVE DATE

67. This Consent Order shall become effective upon the later of the two signatures below.

7-13-20
Date

Walter E Bowles
Walter Bowles
Vice President, HSE
Graphic Packaging International, LLC

Date

Cheryl T. Seager
Cheryl T. Seager
Director
Enforcement and
Compliance Assurance Division
U.S. EPA, Region 6

Digitally signed by CHERYL SEAGER
DN: c=US, o=U.S. Government, ou=Environmental
Protection Agency, cn=CHERYL SEAGER,
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Date: 2020.07.21 13:33:30 -05'00'

Re: Graphic Packaging International, LLC
Docket No. CAA-06-2020-3415

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Administrative Compliance Order on Consent was sent this day in the following manner to the addressees:

Copy via Email to Complainant:

evans.carlos@epa.gov

Copy via Email to Respondent:

lauralynn.church@graphicpkg.com

Dated this _____ day of _____, _____.

CARLOS EVANS

Digitally signed by CARLOS EVANS
DN: c=US, o=U.S. Government, ou=Environmental
Protection Agency, cn=CARLOS EVANS,
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Date: 2020.07.22 13:42:08 -05'00'

Carlos Evans
Assistant Regional Counsel