



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

**1445 Ross Avenue, Suite 1200
Dallas, Texas 75202 - 2733**

MAR 04 2019

CERTIFIED MAIL-RETURN RECEIPT REQUESTED: 7009 2820 0001 8284 4607

Eric Snelgrove
Mill Manager
Packaging Corporation of America – DeRidder Mill
4200 Hwy 190 West, P.O. Box 1060
DeRidder, LA 70634

Re: Clean Air Act Notice of Violation

Dear Mr. Snelgrove:

The United States Environmental Protection Agency (“EPA”) has identified a Packaging Corporation of America (“PCA”) facility as having violated the Clean Air Act (“CAA”) and the regulations promulgated thereunder. This Notice of Violation (“Notice”) is issued to PCA for violations of the CAA, 42 U.S.C. § 7401 *et seq.*, at its PCA facility located at 4200 Highway 190 West, DeRidder, Louisiana, 70634 (“the Facility”). Specifically, EPA believes that PCA¹ has violated 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 Compliance Assurance and Enforcement Division, EPA Region 6.

On October 4, 2018, we sent PCA a letter regarding our Emission Inventory Permit Consistency Review, in which we reviewed the Facility’s emission inventory for criteria pollutant and hazardous air pollutant (HAP) emission totals for calendar years 2016 and 2017, as reported to the Louisiana Department of Environmental Quality (“LDEQ”). As noted in our letter, the Facility’s reported annual emission totals exceeded its permit authorization limits. PCA responded via letter dated November 6, 2018, and provided further information regarding the annual emission totals.

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?Dockkey=P100BYAV.PDF>.

CAA Violation

We are sending this letter to inform PCA of a violation of Louisiana's federally approved SIP at the Facility.

LAC 33:III.919.B.1 of the Louisiana SIP, approved at 76 Fed. Reg. 38,977 (July 5, 2011), requires that PCA submit an Annual Emissions Statement to LDEQ consisting of an inventory of the Facility's actual emissions and the permitted emissions limits of volatile organic compounds (VOCs), nitrous oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), lead (Pb), particulate matter of 10 microns or less (PM₁₀) and 2.5 microns or less (PM_{2.5}), and ammonia. Actual emissions must be reported for all sources of emissions at the Facility, including fugitive emissions, flash gas emissions, insignificant sources, and excess emissions occurring during maintenance, start-ups, shutdowns, upsets, and downtime.

Based on its review, EPA finds that PCA violated LAC 33:III.919.B.1 of the Louisiana SIP by failing to report the Facility's actual emissions in the annual emissions inventories for the following pollutants for reporting years 2016 and 2017:

- Ammonia
- CO
- PM₁₀
- PM_{2.5}
- SO₂
- VOCs

Other Areas of Concern

In addition to those listed above, EPA identified the following pollutants for which actual emissions may not have been reported in the annual emissions inventories for reporting years 2016 and 2017:

- | | |
|-----------------------------|--------------------------|
| • 1,2,4—Trichlorobenzene | • Methyl Ethyl Ketone |
| • Acetaldehyde | • Methyl Isobutyl Ketone |
| • Barium (and compounds) | • Phenol |
| • Benzene Cresol | • Styrene |
| • Dichloromethane | • Tetrachloroethylene |
| • Formaldehyde | • Toluene |
| • Hydrogen Sulfide | • Trichloroethylene |
| • Manganese (and compounds) | • Vinyl Chloride |
| • Methanol | • Xylene (mixed isomers) |

Opportunity to Confer

We appreciate PCA working with us regarding this matter. Please contact Erin Tanimura, Assistant Regional Counsel, Tanimura.Erin@epa.gov, (214) 665-8181, within ten (10) business

days of receipt of this Notice to discuss an administrative path for quick resolution.

Sincerely,

A handwritten signature in dark ink, consisting of a large, stylized 'C' followed by a long, sweeping horizontal line that ends in a small dot.

Cheryl T. Seager
Director, Compliance Assurance and
Enforcement Division

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