



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-1280

937-225-4435 — Fax: 937-225-3486

www.rapca.org

September 24, 2008

Certified Mail

Scott Baker

Greif Packaging LLC

526 Markwith Avenue

Greenville, OH 45331

**RE: OEPA Facility ID 08-19-07-0068
Title V Quarterly Deviation Report – 2nd Quarter 2008
Exceedances of the Clean-Up Materials Usage Limit for K002 & K006**

Dear Mr. Baker:

WARNING LETTER

The Regional Air Pollution Control Agency (RAPCA) acknowledges receipt of the Title V Quarterly Deviation Report for 2nd Quarter 2008 submitted by Greif Packaging LLC (Greif), dated July 1, 2008, and the Revised Title V Quarterly Deviation Report for 2nd Quarter 2008 submitted by Greif, dated July 17, 2008. On the Revised Title V Quarterly Deviation Report submitted for 2nd Quarter 2008, Greif stated that the 12-month rolling total for clean-up materials used at emissions units K002 (Pail and Parts Lining Booth and Oven) and K006 (Roll Coater with Oven), combined, for May and June 2008, exceeded the 12-month rolling limit of 2,013 gallons by 45 gallons in May and 366 gallons in June.

Part III.A.II.2 of Permit to Install (PTI) 08-04673, issued July 14, 2005, for emissions units K002 and K006, and the Final Title V Operating Permit, issued to Greif on June 8, 2006, for emissions units K002 and K006, state that the maximum annual clean-up materials usage rate for emissions units K002 and K006, combined, shall not exceed 2,013 gallons, based on a rolling, 12-month summation of the monthly clean-up usage rates. The exceedances of the 2,013 gallon rolling, 12-month clean-up materials usage limit for K002 and K006, combined, is a violation of Part III.A.II.2 of PTI 08-04673 and the Final Title V Operating Permit for emissions units K002 and K006, and Ohio Revised Code (ORC) 3704.05.

In addition, per General Term and Condition A.1.c.ii of PTI 08-04673 and the Final Title V Operating Permit, the permittee is required to submit written quarterly reports to the appropriate Ohio EPA District Office or local air agency of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken. Since Greif did not provide the probable cause of the exceedances of the clean-up materials usage limit for K002 and K006, or the corrective actions

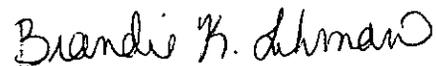
Greif Packaging LLC
September 24, 2008
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or preventative measures taken, the deviation report is incomplete.

In order to resolve the above mentioned violations, RAPCA requires that Greif resubmit the Title V Quarterly Deviation Report for 2nd Quarter 2008, including the probable cause of the exceedances of the clean-up materials usage limit, for K002 and K006, and any corrective actions or preventative measures taken. In addition, RAPCA requires that Greif submit a compliance plan to prevent future exceedances of the rolling, 12-month clean-up materials usage limit for K002 and K006, combined, and to ensure that all future deviations from all permit terms and conditions are properly reported. Greif shall submit all required information to RAPCA within fourteen (14) days after receipt of this letter.

RAPCA appreciates your prompt attention to the compliance issues addressed. If you have any questions concerning this matter, please feel free to contact me at 937-225-5923.

Sincerely,



Brandie K. Lehman
Air Pollution Control Specialist

Cc: Jefferis Canan, RAPCA
Lisa Holscher, USEPA
Tom Kalman, OEPA

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Scott Baker
Greif Packaging LLC
526 Markwith Avenue
Greenville, OH 45331

2. Article Number
(Transfer from service label)

7007 1490 0004 7509 9415

PS Form 3811, February 2004 Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 Addressee
 Agent

B. Received by (Printed Name)
 C. Date of Delivery
 9/26/08

D. Is delivery address different from item 1?
 Yes
 No

SEP 29 2008

REGIONAL AIR
POLLUTION CONTROL

3. Service Type
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4. Restricted Delivery? (Extra Fee) Yes

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 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

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Scott Baker
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PS Form 3800, August 2006 See Reverse for Instructions

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