



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

Re: Marion County  
Graphic Packaging International, Inc.  
Premise #0351010062  
**Notice of Violation (NOV)/Return to  
Compliance**

August 5, 2010

CERTIFIED MAIL

Mr. Robert Zeisler  
Plant Manager  
Graphic Packaging International, Inc.  
1171 West Center Street  
Marion, Ohio 43302

Dear Mr. Zeisler:

The purpose of this letter is to summarize the violations for the Formers, emissions unit R002, located at the above referenced facility. This NOV is being issued for exceedances of the rolling, 12-month material usage limit of 20,000 pounds of adhesive from April to June 2010, as reported in the facility's quarterly deviation report submitted on July 20, 2010, as required by Permit to Install and Operate (PTIO) #P0103954, issued April 16, 2009. This is a violation of term and condition (2)c)(1) of PTIO #P0103954 and Ohio Revised Code (ORC) 3704.05.

On November 30, 2009, Graphic Packaging International, Inc. (GPII), submitted a permit modification application to revise the rolling, 12-month material usage limit for emissions unit R002 from 20,000 pounds of adhesives to 80,000 pounds. GPII expects to easily comply with the revised adhesive usage rate requested.

On June 10, 2010, a Final PTIO was issued to the facility. With the issuance of the Final PTIO emissions unit R002, will be operated in compliance with the permit requirements. The actions taken have corrected the violations and therefore, require no further action from the facility. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

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Should you have any questions or comments concerning this letter, please feel free to contact me at the above address or call (419) 373-4110.

Sincerely,



Erin Shalabe  
Division of Air Pollution Control

/l/r

pc: Mark Budge, DAPC/NWDO  
Tom Kalman, DAPC/CO  
Lisa Holscher, US EPA-Region V  
DAPC-NWDO File  
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1171 West Center Street  
Mansfield, OH 43302

Form 3800, August 2006 See Reverse for Instructions