



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

October 16, 2012

RE: Guernsey County
International Paper - Byesville
0630000108
Notice of Violation Non-HPV

Certified: 70102780000197062125

Mr. Chuck Evans, Environmental
International Paper - Byesville
60700 Hope Ave.
Byesville, Ohio 43723

Dear Mr. Evans:

On August 1, 2012, Jessica Dingman, Jessica Kelley and I performed an inspection of the International Paper - Byesville facility located at 60700 Hope Ave., Guernsey County, Ohio. You were present throughout the inspection. On August 15, 2012, Jessica Dingman and I returned to perform visible emissions observations (VEOs) of the cyclone stack. The inspections were conducted to determine the facility's compliance with the current permit-to-install (PTI) terms and conditions and state and federal air pollution control rules and regulations prior to issuing a renewal permit to install and operate (PTIO).

The emissions unit located at International Paper – Byesville is currently labeled as corrugated paper manufacturing, P001. International Paper – Byesville was issued PTI 06-06259 on September 19, 2000, for P001 and a Chapter 31 modification PTI for P001 (06-08144) on June 20, 2006. A permit-to-operate (PTO) application was received June 15, 2006. This application is currently pending.

Per our conversation, and observations during the inspection, the description of corrugated paper manufacturing for P001 is not accurate. The facility cuts, folds, glues and has printing capabilities for the corrugated paper that is shipped into the plant. The facility does not however manufacture the corrugated paper.

During the inspection, we observed International Paper – Byesville to have one cyclone, more than one baghouse and multiple floor sweeps. PTI 06-08144 states the following under Operational Restrictions:

"The permittee shall operate the cyclone and baghouse, connected in series, at all times when this emissions unit is in operation"

Although the baghouses, cyclone and floor sweeps do operate when the emissions unit is in operation, the baghouse and cyclone are not connected in series. Some parts of P001 are vented to a baghouse, some to floor sweeps and some to the cyclone. Failure to employ control equipment in accordance with required operational restrictions is a violation of PTI 06-08144.

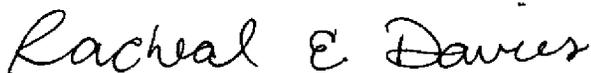
During the inspection, you stated that a new gang saw and band saw had been installed. Both of these units are vented to separate baghouse systems. Ohio Administrative Code (OAC) rule 3745-31-02(A)(1)(b) prohibits the installation or modification, and subsequent operation of any new, non-major source without first obtaining a PTIO. Although the new gang saw was included in the PTO application, received June 15, 2006, no PTI was issued for the equipment. No information pertaining to the band saw was received by Ohio EPA prior to the inspection.

In the list of equipment, which was received on August 10, 2012, you also listed an Eccentric Slotter, a 24 inch press, a 72 inch press, a general taper/gluer and an Iton Stitcher/gluer. The above mentioned equipment is not included in the permits currently held by International Paper – Byesville. Therefore, **Ohio EPA requests that within thirty (30) days of receipt of this letter**, International Paper – Byesville:

- a. evaluate all unpermitted equipment located at the facility to determine if a PTIO application is needed; and
- b. Submit a compliance plan and schedule that details the facility's strategy to return to compliance with control requirements.

If you cannot respond within the given time frame, or have any questions or concerns, I urge you to please contact me so that I may be of assistance to you. I can be reached by telephone at (740)380-5246 or via email at racheal.sams@epa.state.oh.us.

Sincerely,



Racheal Davies
Ohio EPA Southeast District Office
Division of Air Pollution Control Intern

RD/cs

cc: Dean Ponchak
Bruce Weinberg
Michelle Jencius Region V