

AIR POLLUTION CONTROL DIVISION

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CERTIFIED MAIL

JUNE 11, 2013

Mr. William Shew - Mill Manager
Greif Packaging, LLC
P.O. Box 675
9420 Warmington Rd. SW
Massillon, OH 44648-0675

**Re: NOTICE OF VIOLATION; Significant Non-compliance
Permit emission limitations and reporting requirements
Greif Packaging Facility located at 9420 Warmington Rd. SW, Massillon, OH 44648, Stark County
Facility ID # 1576000431**

Dear Mr. Shew:

The Greif Packaging facility currently operates the following Emissions Units (EUs):

P003 - 6.5 MW gas turbine-generator, currently permitted under PTIO P0109236 issued on 2/7/2012

B008 - duct burner and heat recovery boiler currently permitted under PTIO P0109236 issued on 2/7/2012

B009 - 137 MMBtu/hr nat. gas-fired boiler currently permitted under PTIO P0109349 issued on 2/7/2012

On October 23, 2012, you submitted a Permit Evaluation Report (PER) for EUs P003 and P008 which was not accepted by this agency because it did not have the required emissions testing information attached. On November 6, 2012, you re-submitted the PER with emissions testing information attached. However since the emissions test information was not in the required format (lb/mmBtu), this agency did not accept this report either.

On April 22, 2013, I met with you to discuss the details of providing the additional reporting information required to be submitted with the annual Permit Evaluation Reports (PERs) for the above EUs. We also discussed whether the permitted emissions limits for NOx and CO could be changed from a lb/MMBtu format to a lb/hr format (which was determined not possible based on Ohio EPA Best Available Technology (BAT) policy) and your desire to reduce the recordkeeping and testing requirements in the current permits for these EUs.

As a follow-up to the meeting, on April 23, 2013, you sent me copies of spreadsheets for my review and comments as to whether they would be considered acceptable in meeting the permit additional reporting requirements. These spreadsheets showed the average NOx and CO concentrations in lbs/mmBtu emitted during once-per-month stack testing using portable analyzers for a time period covering October 2011 through September 2012 for EUs P003/B008 combined, and for a time period covering March 2012 through September 2012 for EU P009.

My review of the spreadsheets have exposed a number of violations of your permit requirements. Below is a listing of the findings, violations, and suggested actions to resolve or address the violations.

Finding #1:

The data reported for the monthly emissions tests in the above referenced April 23, 2013 spreadsheets shows that the permit allowable mass limit for CO emissions from P003/B008 was exceeded on (2) monthly stack testing dates, and the permit allowable mass limit for NO_x emissions from B009 was exceeded on (5) monthly stack testing dates. The reported results of the stack tests and the permitted mass emissions limits are tabulated below:

EU ID	Test Date	Pollutant	Test Results	Permit Limit
P003/P008	7/26/2012	CO	0.053 lb/MMBtu	0.045 lb/MMBtu
	8/17/2012	CO	0.068 lb/MMBtu	

EU ID	Test Date	Pollutant	Test Results	Permit Limit
B009	3/23/2012	NO _x	0.038 lb/MMBtu	0.036 lb/MMBtu
	4/30/2012	NO _x	0.043 lb/MMBtu	
	5/18/2012	NO _x	0.039 lb/MMBtu	
	7/26/2012	NO _x	0.039 lb/MMBtu	
	9/21/2012	NO _x	0.044 lb/MMBtu	

Violation of:

Exceeding the permit allowable mass emissions limits is a violation of the term and condition Section C.1.b)(1)a of PTIO P0109236 for EUs P003 and B008, and a violation of the term and condition Section C.1.b)(1)a of PTIO P0109236 for EU B009. Violations of the terms and conditions of an issued PTIO are also considered violations of Ohio Revised Code (ORC) 3704.05(C), which states:

“No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions.”

Finding #2:

Exceedances of the NO_x and CO mass emissions rates were not reported to this agency either through Air Services or written notification.

Violation of:

Failure to report the exceedances of the permit allowable NO_x and CO mass emissions rates is a violation of the Reporting Requirements in Section C.1.e)(3) of PTIO P0109236 for EUs P003 and B008 and Section C.1.e)(3) of PTIO P0109349 for EU B009, which states:

“The permittee shall submit a written report to Canton City Health Department, Air Pollution Control Division, whenever a calculated mass emission rate in pounds per MMBtu of NO_x or CO required to be recorded... from the portable monitor measurements exceeds the emission limitations in b)(1)a. These reports shall be submitted within fourteen days of the day when the measurements were made with the portable analyzer.”

Requested Actions:

1. No later than June 28, 2013, please submit a written compliance plan detailing the corrective actions that you plan to take to prevent these violations from occurring in the future and an estimated time frame for completion of those actions. The following suggested corrective actions are offered for your consideration, but are not meant in any way to limit your options:
 - a. In general, whether generated by internal or external combustion, NO_x and CO emissions vary inversely. It may be possible to re-tune the turbine and boiler combustion controls to achieve the existing permit emissions limits for both pollutants.

- b. The facility may wish to comply with the existing permit emissions limits by taking voluntary reductions in the maximum firing rate permitted for the EUs. In general, NO_x and CO emissions decrease as firing rate decreases. The existing air permit(s) would be administratively modified and re-issued to accommodate the voluntary restrictions.
 - c. The existing air permit(s) could be administratively modified and re-issued to increase the allowable emissions for NO_x and CO corresponding to values slightly higher than the current out-of-compliance test values. Please note that if the emission limits increase too much, a synthetic minor permit may apply.
2. Immediately upon receipt of this letter, begin submitting reports of exceedances of the permit allowable NO_x and CO mass emissions rates within 14 days of measurement with the portable analyzers as required in Section C.1.e)(3) of the above referenced PTIOs. Please submit past due reports for the exceedances noted above when you submit the compliance plan.

Additional Information:

1. You submitted compliance report No. 63237 on 4/11/2013 (late- due date was 1/31/2013) for CY 2012 for EUs P003/B008 and P009. I have reviewed the report and marked the status as “not accepted” because the calculated NO_x and CO mass emissions rates for P003/B008 were not included. Please also be aware that:
 - a. EU B009 should not have been included in the report because its PTIO (P0109349) requires submitting only an annual PER with appropriate attachments, not a CY2012 report.
 - b. The CY 2012 annual reporting requirement for P003/B008 was required by PTIO P0100950 which was superseded by PTIO P0109236 on 2/18/2012. Thus the CY 2012 report would have had to cover only the month of January 2012 and part of February. Instead of the CY 2012 report, the current permit for P003/B008 requires submitting only an annual PER with appropriate attachments.
 - c. Because PTIO P0100950 was effective only for one full month of 2012, resubmitting of the CY2012 annual report is considered unnecessary.
2. You submitted compliance report No. 63238 on 4/11/2013 for QTR1 of CY 2013 for EUs P003/B008 and P009. I have reviewed the report and marked the status as “not accepted” because the current PTIOs for these EUs require submitting only an annual PER with appropriate attachments, not quarterly reports.

We would be happy to work with you to answer any questions while you are developing a compliance plan. We would also like to further discuss modifying the PTIOs to address your concern for making the testing requirements less burdensome. I believe that since we now have at least 7 months’ worth of monthly test data to examine, it is easier to determine new NO_x and CO mass emissions limits with a high level of confidence and consequently modify the permit terms to reduce the testing frequency.

Please note that this letter or information pursuant to this letter does not preclude the Ohio EPA from seeking civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). The decision on whether to seek such penalties will be made Ohio EPA at a later date.

If you have any questions, please contact me at 330-489-3385 or E-mail: epabin@cantonhealth.org
Sincerely,

Edward J. Pabin

Ed Pabin
Air Pollution Control Engineer
Canton City Health Department

cc: Bruce Weinberg, Central Office, Ohio EPA
Brian Dickens, Region 5 U.S. EPA