



Re: Graphic Packaging International, LLC  
Docket No. CAA 06-2023-3329

of the Act, 42 U.S.C. § 7602(e).

4. Complainant and Respondent, having agreed that settlement of this action is in the public interest, consent to the entry of this Consent Agreement along with the corresponding Final Order hereinafter known together as “CAFO” without adjudication of any issues of law or fact herein, and Respondent agrees to comply with the terms of this CAFO.

#### **B. JURISDICTION**

5. This CAFO is entered into under Section 113(d) of the Act, as amended, 42 U.S.C. § 7413(d), and the Consolidated Rules, 40 C.F.R. Part 22. The alleged violation in this CAFO are pursuant to Section 113(a)(3), 42 U.S.C. § 7413(a)(3).

6. The EPA and the United States Department of Justice jointly determined that this matter, although it involves alleged violation that occurred more than a year before the initiation of this proceeding, is appropriate for an administrative penalty assessment. 42 U.S.C. § 7413(d); 40 C.F.R. § 19.4.

7. In satisfaction of the notice requirements of Section 113(a)(1), on July 14, 2021, the EPA issued to Respondent a Notice of Potential Violation (“NOPVOC”) and provided a copy of the NOPVOC to the State of Louisiana, providing notice to both that the EPA found that Respondent committed the alleged violation described of Section E of this CAFO and providing Respondent an opportunity to confer with the EPA. On October 7, 2021, representatives of Respondent and the EPA discussed the July 14, 2021, NOPVOC.

8. The Regional Judicial Officer is authorized to ratify this CAFO which memorializes a settlement between Complainant and Respondent. 40 C.F.R. § 22.4(b) and 22.18(b).

9. The issuance of this CAFO simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).

### **C. GOVERNING LAW**

10. The Act is designed “to protect and enhance the quality of the Nation’s air so as to promote public health and welfare and the productive capacity of its population.” CAA § 101(b)(1), 42 U.S.C. § 7401(b)(1).

#### **National Emission Standards for Hazardous Air Pollutants**

11. Section 112 of the CAA, 42 U.S.C. § 7412, sets forth a national program for the control of hazardous air pollutants (“HAPs”). Under Section 112(b), Congress listed 188 HAPs believed to cause adverse health or environmental effects. 42 U.S.C. § 7412(b)(1).

12. Congress directed EPA to publish a list of all categories and subcategories of, *inter alia*, major sources of HAPs. CAA § 112(c), 42 U.S.C. § 7412(c).

13. Congress directed EPA to promulgate regulations establishing emission standards for each category or subcategory of, *inter alia*, major sources of HAPs. CAA § 112(d)(1), 42 U.S.C. § 7412(d)(1). These emission standards must require the maximum degree of reduction in emissions of HAPs that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for the new or existing sources in the category or subcategory to which the emission standard applies. CAA § 112(d)(2), 42 U.S.C. § 7412(d)(2).

14. To the extent that it is not feasible to prescribe or enforce an emission standard for the control of a HAP, Congress authorized EPA to promulgate “design, equipment, work practice, or operational” standards, which are to be treated as emission standards. CAA § 112(h), 42 U.S.C. § 7412(h).



15. The emission standards promulgated under Section 112 of the 1990 Amendments of the CAA, 42 U.S.C. § 7412, are known as the National Emission Standards for Hazardous Air Pollutants (“NESHAPs”) for Source Categories or “MACT” (“maximum achievable control technology”) standards. These emission standards are found in Part 63 of Title 40 of the Code of Federal Regulations.

16. After the effective date of any emission standard, limitation, or regulation promulgated pursuant to Section 112 of the CAA, no person may operate a source in violation of such standard, limitation, or regulation. 42 U.S.C. § 7412(i)(3).

17. Section 112(a)(1) of the CAA, 42 U.S.C. § 7412(a)(1), defines a “major source” to mean “any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.” *See also* 40 C.F.R. § 63.2.

NESHAPs Subpart S

18. Pursuant to Section 112 of the CAA, 42 U.S.C. § 7412, EPA has NESHAPs for the Pulp and Paper Industry. 40 C.F.R. Part 63, Subpart S, §§ 63.440-63.459 (“NESHAPs Subpart S”).

19. NESHAPs Subpart S applies to “the owner or operator of processes that produce pulp, paper, or paperboard; that are located at a plant site that is a major source pursuant to 40 C.F.R. § 63.2 . . . ; and that uses the following processes and materials: (1) [k]raft, soda, sulfite, or semichemical pulping processes using wood; or (2) [m]echanical pulping processes using wood; or (3) [a]ny process using secondary or non-wood fibers.” 40 C.F.R. § 63.440(a).

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20. 40 C.F.R. § 63.454 establishes various recordkeeping requirements for owners and operators of pulp and paper mills.

21. Pursuant to 40 C.F.R. § 63.454(b), owners and operators shall maintain a site-specific inspection plan including a drawing or schematic of the components of each closed vent and closed collection system.

22. Pursuant to 40 C.F.R. § 63.454(b), owners and operators must record information for all inspections of each closed-vent system and closed collection system. Such information shall include the date of inspection and the equipment type and identification for each inspection. 40 C.F.R. § 63.454(b)(1)-(2).

#### **D. FINDINGS OF FACT AND CONCLUSIONS OF LAW**

23. Graphics Packaging International, LLC ("GPI") owns and operates the West Monroe Mill #31 located at 1000 Jonesboro Road, West Monroe, Louisiana 71294 (the "Facility").

24. At all times relevant to this proceeding, Respondent has owned and/or operated the Facility.

25. Respondent is the owner and/or operator of the Facility within the meaning of the Act, Section 112(a)(9), 42 U.S.C. § 7412(a)(9), and 40 C.F.R. § 63.2.

26. At all times relevant to this proceeding, Respondent owned and/or operated units that emits HAPs at the Facility.

27. The Facility is a kraft pulp and paper mill that produces solid unbleached substrate that is not corrugated.

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28. The Facility is a “stationary source” as that term is defined in Section 112(a)(9), 42 U.S.C. § 7412(a)(9), and 40 C.F.R. §§ 60.2 and 63.2.

29. At all times relevant to this proceeding, the Facility was a “major source” within the meaning of the Act’s Title V program, Section 501(2) of the Act, 42 U.S.C. § 7661(2), and 40 C.F.R. § 70.2.

30. The Facility is subject to the CAA Title V Federal Operating Permit (“FOP”) program.

31. On or about April 27, 2020, Respondent was issued Permit No. 2160-0001-V19 (the “Title V Permit”) an air permit issued by the Louisiana Department of Environmental Quality. The Title V Permit covers various emissions units at the Facility, including criteria air pollutants and HAPs.

32. Based on the March 11-15, 2019 on-site inspection, subsequent review of documents provided by the Facility during and after the inspection, and other disclosures made by Respondent, EPA identified alleged violation of the CAA at the Facility as described in Section E of this CAFO.

#### **E. ALLEGED VIOLATION**

##### **Failure to maintain a site-specific inspection plan that includes all applicable affected components.**

33. The Facility is subject to NESHAPs Subpart S, under which Respondent was and is required to maintain a site-specific inspection plan including drawings or schematics of components of applicable affected equipment including ductwork, piping, enclosures, connectors of closed vent systems and pulping process closed collection systems. The owner/operator is also required to maintain records of each inspection on affected equipment, *see* 40 C.F.R. § 63.454(b).

34. On information and belief, during the March 11-15, 2019 on-site inspection, the majority of the pulping condensate collection system components and some of the closed vent system components were not included in the site-specific inspection plan and the Facility had no record of visual inspections. In total, 519 components were not identified in the site-specific inspection plan.

35. Respondent's failure to maintain a site-specific inspection plan that includes all applicable affected components violated 40 C.F.R. § 63.454(b).

#### **F. CIVIL PENALTY AND CONDITIONS OF SETTLEMENT**

##### **General**

36. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2),

Respondent:

- a. admits that the EPA has jurisdiction over the subject matter alleged in this CAFO;
- b. neither admits nor denies the specific factual allegations contained in the CAFO;
- c. consents to the assessment of a civil penalty as stated below;
- d. consents to the issuance of any specified compliance or corrective action order<sup>1</sup>;
- e. consents to the conditions specified in this CAFO;
- f. consents to any stated Permit Action<sup>2</sup>;
- g. waives any right to contest the alleged violation set forth in Section E of this CAFO; and

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<sup>1</sup> Although 40 CFR 22.18(b)(2) requires each subbullet, d and f are not applicable to the particular case.

<sup>2</sup> See *id.*



h. waives its rights to appeal the Final Order included in this CAFO.

37. For the purpose of this proceeding, Respondent:

- a. agrees that this CAFO states a claim upon which relief may be granted against Respondent;
- b. acknowledges that this CAFO constitutes an enforcement action for purposes of considering Respondent's compliance history in any subsequent enforcement actions;
- c. waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this CAFO, including any right of judicial review under Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1);
- d. consents to personal jurisdiction in any action to enforce this CAFO in the United States District Court for the Western District of Louisiana;
- e. waives any right it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to compel compliance with this CAFO and to seek an additional penalty for such noncompliance, and agrees that federal law shall govern in any such civil action; and
- f. agrees that in any subsequent administrative or judicial proceeding initiated by the Complainant or the United States for injunctive relief, civil penalties, or other relief relating to this Facility, Respondent shall not assert, and may not maintain, any defense or claim based upon the



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principles of waiver, res judicata, collateral estoppel, issue preclusion, claim preclusion, claim splitting, or other defenses based on any contention that the claims raised by the Complainant or the United States were or should have been brought in the instant case, except with respect to claims that have been specifically resolved pursuant to this CAFO.

Penalty Assessment and Collection

38. Upon consideration of the entire record herein, including the Findings of Fact and Conclusions of Law, which are hereby adopted and made a part hereof, and upon consideration of the size of the business, the economic impact of the penalty on the business, the Respondent's full compliance history and good faith efforts to comply, the duration of the violation, payment by the violator of penalties previously assessed for the same violation, the economic benefit of noncompliance, the seriousness of the violation, and other factors as justice may require, EPA has assessed a civil penalty in the amount of \$120,800 ("EPA Penalty"). The EPA Penalty has been determined in accordance with the Section 113 of the Act, 42, U.S.C. § 7413 and at no time exceeded EPA's statutory authority.

39. Respondent agrees to:

- a. pay the EPA Penalty within 30 calendar days of the Effective Date of this CAFO, and
- b. pay the EPA Penalty by cashier's check, certified check, or wire transfer made payable to "Treasurer, United States of America, EPA – Region 6." Payment shall be remitted in one of five (5) ways: (1) regular U.S. Postal Service mail including certified mail; (2) overnight mail; (3) wire transfer;

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(4) Automated Clearinghouse for receiving US currency; or (5) On Line  
Payment.

For regular U.S. Postal Service mail, U.S. Postal Service certified mail, or U.S. Postal Service  
express mail, payment should be remitted to:

U.S. Environmental Protection Agency  
Fines and Penalties  
Cincinnati Finance Center  
PO Box 979077  
St. Louis, MO 63197-9000

For overnight mail (non-U.S. Postal Service, e.g., FedEx), payment should be remitted to:

U.S. Bank  
Government Lockbox 979078  
U.S. EPA Fines & Penalties  
1005 Convention Plaza  
SL-MO-C2-GL  
St. Louis, MO 63101

Contact: Natalie Pearson  
(314) 418-4087

For wire transfer, payment should be remitted to:

Federal Reserve Bank of New York  
ABA: 021030004  
Account Number: 68010727  
SWIFT address: FRNYUS33  
33 Liberty Street  
New York, NY 10045

Field Tag 4200 of the Fedwire message should read:  
"D 68010727 Environmental Protection Agency"

For Automated Clearinghouse (also known as REX or remittance express):

U.S. Treasury REX / Cashlink ACH Receiver  
ABA: 051036706  
Account Number: 310006, Environmental Protection Agency  
CTX Format Transaction Code 22 – checking  
Physical location of U.S. Treasury facility:  
5700 Rivertech Court  
Riverdale, MD 20737

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Contact – Jesse White (301) 887-6548

For On Line Payment:

<https://www.pay.gov/paygov/>  
Enter sfo 1.1 in search field  
Open form and complete required fields.

PLEASE NOTE: The docket number CAA 06-2023-3329 should be clearly typed on the check to ensure proper credit. The payment shall also be accompanied by a transmittal letter that shall reference Respondent's name and address, the case name, and docket number CAA 06-2023-3329. Respondent's adherence to this request will ensure proper credit is given when penalties are received for the Region. Respondent shall also send a simultaneous notice of such payment, including a copy of the money order, or check, and the transmittal letter to the following addresses:

Justin Chen  
U.S. EPA Region 6  
[chen.justin@epa.gov](mailto:chen.justin@epa.gov)

And

Lorena Vaughn  
Region 6 Hearing Clerk  
U.S. EPA Region 6  
[vaughn.lorena@epa.gov](mailto:vaughn.lorena@epa.gov)

40. Respondent agrees to pay the following on any overdue EPA Penalty:

- a. Interest. Pursuant to Section 113(d)(5) of the Act, 42 U.S.C. § 7413(d)(5), any unpaid portion of a civil penalty must bear interest at the rates established pursuant to 26 U.S.C. § 6621(a)(2).

41. Nonpayment Penalty. On any portion of a civil penalty more than 90 calendar days delinquent, Respondent must pay a nonpayment penalty, pursuant to Section 113(d)(5) of the Act, 42 U.S.C. § 7413(d)(5), which shall accrue from the date the penalty payment became delinquent, and which shall be in addition to the interest which accrues under subparagraph a. of this paragraph. Respondent shall pay a charge to cover the cost of processing and handling

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any delinquent penalty claim, pursuant to 42 U.S.C. § 7413(d)(5), including but not limited to attorneys' fees incurred by the United States for collection proceedings.

42. If Respondent fails to timely pay any portion of the penalty assessed under this CAFO, the EPA may:

- a. refer the debt to a credit reporting agency, a collection agency, or to the Department of Justice for filing of a collection action in the appropriate United States District Court (in which the validity, amount, and appropriateness of the assessed penalty and of this CAFO shall not be subject to review) to secure payment of the debt, which may include the original penalty, enforcement and collection expenses, nonpayment penalty and interest, 42 U.S.C. § 7413(d)(5) and 40 C.F.R. §§ 13.13, 13.14, and 13.33;
- b. collect the above-referenced debt by administrative offset (i.e., the withholding of money payable by the United States to, or held by the United States for, a person to satisfy the debt the person owes the Government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, 40 C.F.R. Part 13, Subparts C and H; and
- c. suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, 40 C.F.R. § 13.17.

Conditions of Settlement

43. As a Condition of Settlement, Respondent agrees to the following:



a. Within 120 (one hundred and twenty) days of the Effective Date of this CAFO, Respondent shall submit the following to EPA:

1. An updated site-specific inspection plan (“Inspection Plan”) including each applicable enclosure opening, closed-vent system, and closed collection system. Respondent must review and update the Inspection Plan according but not limited to, 40 C.F.R. sections 63.453(k) and (l) and 63.454(b). The Inspection Plan must include all pulping process condensates closed-collection system conveyances used to comply with 40 C.F.R. 63.446(d) and defined by the individual drain system requirements in 40 C.F.R., Part 63, Subpart RR, and must incorporate any updates necessary to support compliance with all applicable federal, state, and local component monitoring regulations. Respondent must integrate quality assurance and quality control measures into the Inspection Plan. The Facility’s Inspection Plan will include procedures for checking the accuracy of component listings and schematics.
2. A Training Protocol and Program (“Program”) for implementation of the Inspection Plan, which requires initial and annual training for the employees in areas who have duties relevant to the Program.

b. After three hundred and five (305) days of the Effective Date of this CAFO, Respondent shall submit within sixty (60) days to the EPA the past

twelve (12) months of inspection records conducted as part of the  
Facility's Inspection Plan.

44. At such time as the Respondent believes that it has complied with all terms and conditions of this CAFO, Respondent agrees to certify to EPA completion of the Conditions of Settlement in Paragraph 43 above and provide any necessary documentation. Respondent represents that the signing representative will be fully authorized by Respondent to certify that the terms and conditions of this CAFO have been met. The certification should include the following statement:

"I certify under penalty of law that I have examined and am familiar with the information submitted in this document and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fines and imprisonment."

45. Any information or correspondence submitted by Respondent to EPA under this CAFO shall be submitted by email to:

Justin Chen  
Enforcement Officer  
Air Toxics Enforcement Section (ECDAT)  
U.S. EPA Region 6  
Chen.Justin@epa.gov

46. Respondent agrees that the time period from the Effective Date of this CAFO until all the conditions specified in Paragraph 43 are completed (the "Tolling Period") shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by Complainant on any claims set forth in Section E of this CAFO (the "Tolled Claims"). Respondent shall not assert, plead, or raise in any fashion, whether by answer, motion or otherwise, any defense of laches, estoppel, or waiver, or other similar equitable

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defense based on the running of any statute of limitations or the passage of time during the Tolling Period in any action brought on the Tolloed Claims.

47. The provisions of this CAFO shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors and assigns. From the Effective Date of this Agreement until the end of the Tolling Period, as set out in Paragraph 45, Respondent must give written notice and a copy of this CAFO to any successors in interest prior to transfer of ownership or control of any portion or interest in the Facility. Simultaneously with such notice, Respondent shall provide written notice of such transfer, assignment, or delegation to the EPA. In the event of any such transfer, assignment or delegation, Respondent shall continue to be bound by the obligations or liabilities of this CAFO until the EPA has provided written approval.

48. By signing this CAFO, Respondent acknowledges that this CAFO will be available to the public and agrees that this CAFO does not contain any confidential business information. *See* 40 C.F.R. Part 2, Subpart B (Confidentiality of Business Information).

49. By signing this CAFO, the undersigned representative of Complainant and the undersigned representative of Respondent each certify that he or she is fully authorized to execute and enter into the terms and conditions of this CAFO and has legal capacity to bind the party he or she represents to this CAFO.

50. By signing this CAFO, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each submission, response, and statement. Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.



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51. EPA and Respondent agree to the use of electronic signatures for this matter. EPA and Respondent further agree to electronic service of this CAFO by email to the following addresses:

To EPA: RichSteinmetz.Lindsay@epa.gov

To Respondent: Bryant.Bremer@keanmiller.com

52. Respondent specifically waives its right to seek reimbursement of its costs and attorney's fees under 5 U.S.C. § 504 and 40 C.F.R. Part 17. Except as qualified by Paragraph 38, each party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.

**G. EFFECT OF CONSENT AGREEMENT AND FINAL ORDER**

53. In accordance with 40 C.F.R. § 22.18(c), completion of the terms of this CAFO resolves only Respondent's liability for federal civil penalties for the violation and facts specifically alleged above.

54. If Respondent fails to timely and satisfactorily complete every condition stated in Paragraph 42 (including payment of any stipulated penalties owed), then Complainant may compel Respondent to perform the conditions in Paragraph 42, seek civil penalties that accrue from the Effective Date of this CAFO until compliance is achieved, and seek other relief in a civil judicial action pursuant to the Clean Air Act, pursuant to contract law, or both.

55. Penalties paid pursuant to this CAFO shall not be deductible for purposes of federal taxes.

56. For purposes of the identification requirement in Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. § 162(f)(2)(A)(ii), and 26 C.F.R. § 1.162-21(b)(2),



performance of Paragraph 42 is restitution, remediation, or required to come into compliance with the law.

57. This CAFO constitutes the entire agreement and understanding of the parties and supersedes any prior agreements or understandings, whether written or oral, among the parties with respect to the subject matter hereof.

58. The terms, conditions, and compliance requirements of this CAFO may not be modified or amended except upon the written agreement of both parties, and approval of the Regional Judicial Officer.

59. Any violation of the included Final Order may result in a civil judicial action for an injunction or civil penalties of up to \$117,468 per day of violation, or both, as provided in Section 113(b)(2) of the Act, 42 U.S.C. § 7413(b)(2), as well as criminal sanctions as provided in Section 113(c) of the Act, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this CAFO in an administrative, civil judicial, or criminal action.

60. Nothing in this CAFO shall relieve Respondent of the duty to comply with all applicable provisions of the Act and other federal, state, or local laws or statutes, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on, or a determination of, any issue related to any federal, state, or local permit. The EPA does not, by its consent to the entry of this CAFO, warrant or aver in any manner that Respondent's compliance with any aspect of this CAFO will result in compliance with provisions of the Clean Air Act, 42 U.S.C. § 7401, et seq., or with any other provisions of federal, state, or local laws, regulations, or permits.

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61. Nothing herein shall be construed to limit the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.

**H. EFFECTIVE DATE**

62. Respondent and Complainant agree to the issuance of the included Final Order. Upon filing the EPA will transmit a copy of the filed CAFO to the Respondent. This CAFO shall become effective after execution of the Final Order by the Regional Judicial Officer on the date of filing with the Hearing Clerk.

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The foregoing Consent Agreement In the Matter of Graphic Packaging International, LLC,  
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FOR RESPONDENT:

Date: \_\_\_\_\_



\_\_\_\_\_  
Lauren S. Tashma  
EVP, General Counsel, and Secretary  
Graphic Packaging International, LLC

FOR COMPLAINANT:

Date: May 16, 2023



Digitally signed by  
CHERYL SEAGER  
Date: 2023.05.16  
16:59:38 -05'00'

\_\_\_\_\_  
Cheryl T. Seager  
Director  
Compliance Assurance and  
Enforcement Division  
U.S. EPA, Region 6  
1201 Elm Street, Suite #500  
Dallas, Texas 75270-2102





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CERTIFICATE OF SERVICE

I hereby certify that on the date in the electronic signature below, an electronic copy of the foregoing Consent Agreement and Final Order was electronically delivered to the Regional Hearing Clerk, U.S. EPA - Region 6, 1201 Elm Street, Suite #500, Dallas, Texas 75270-2102, and a true and correct copy was delivered to the following individual(s) by the method indicated below:

EMAIL - READ RECEIPT REQUESTED

Megan Hilburn  
Senior Environmental Manager  
Graphic Packaging International, LLC  
West Monroe Mill  
1000 Jonesboro Road  
West Monroe, Louisiana 71292  
Megan.Hilburn@graphicpkg.com

Bryant Bremer  
Kean Miller LLP  
400 Convention Street, Suite 700  
Baton Rouge, Louisiana 70802  
Bryant.Bremer@keanmiller.com

**LORI  
JACKSON**

Digitally signed by LORI JACKSON  
DN: c=US, o=U.S. Government,  
ou=Environmental Protection  
Agency, cn=LORI JACKSON,  
0.9.2342.19200300.100.1.1=680010  
03655539  
Date: 2023.05.18 10:35:18 -05'00'

U.S. EPA, Region 6  
Dallas, Texas