



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 06 2015

REPLY TO THE ATTENTION OF:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216

Dear Mr. Hall,

The U.S. Environmental Protection Agency has reviewed the draft Title V Permit, permit number P0118711, for Sonoco Flexible Packaging Co Inc. in Franklin, Ohio. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment:

For emission units K008, K009, K010, and P012 the volatile organic compounds (VOC) emissions are based upon potential to emit of and the overall control efficiency requirement of the emission unit. An equation is included as the applicable compliance method, however there is no limitations within the permit for the maximum VOC content of the materials used at the facility. Should the facility change any of the materials used, emissions may increase depending on the VOC content. To ensure that the potential to emit restrictions identified in the emission calculations are enforceable as a practical matter, Ohio Environmental Protection Agency should establish a maximum VOC content limitation on the materials used at the facility.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Charmagne Ackerman, of my staff, at (312) 886-0448.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico
Chief
Air Permits Section