



Received State of Indiana

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Department of Environmental Management
OFFICE OF AIR QUALITY

Andrew Taylor, Enforcement Case Manager
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Ave
Indianapolis, IN 46204-2251

Date: February 27, 2026

Mr. Taylor,

Genpak respectfully requests the Department to reconsider the following items in Section II of the proposed order:

4) Pursuant to IC 13-30-4-1, Respondent is assessed and agrees to pay a civil penalty of Seventeen Thousand Five Hundred Dollars (\$17,500.00). Said penalty amount shall be due and payable to the Environmental Management Special Fund within thirty (30) days of the Effective Date; the thirtieth day being the "Due Date."

Immediately prior to the time of the alleged violation for failing to conduct emissions testing, the facility experienced a sudden change in staff in charge of coordinating emissions testing. Upon discovery of the alleged violation, the facility conducted the emissions test as soon as possible.

Additionally, during the alleged period of noncompliance, the facility operated its control devices within the parameters of the emissions test conducted on April 25, 2018. The results of the stack test conducted on January 17 – 18, 2026 demonstrated the required VOC destruction efficiency at similar operating conditions compared to the April 25, 2018, test. As such, the potential for excess emissions resulting from the alleged violation should be considered minor.

Genpak respectfully requests the Department reconsiders its assessment of civil penalty due to these factors.

Respectfully,

A handwritten signature in dark ink that reads "Darlene Palmer".

Darlene Palmer
Director Manufacturing Finance
Genpak, LLC
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