



Battle Creek Mill  
79 East Fountain Street  
Battle Creek, MI 49017

Date: January 24, 2018

Rex Lane  
Michigan Department of Environmental Quality  
Air Division  
Kalamazoo District Office  
7953 Adobe Road,  
Kalamazoo, Michigan 49009-5025

DEQ Kalamazoo

JAN 25 2018

ARD - Received - via e-mail

Re: Facility Name: Graphic Packaging International, LLC  
Location: Battle Creek, MI  
Violation Notice B1534 Dated January 4, 2018

Dear Mr. Lane:

On January 4, 2018, Graphic Packaging International, LLC ("GPI") received a violation notice from the Michigan Department of Environmental Quality ("MDEQ") for citizen complaints on November 28, 2017 and December 5, 2017 regarding the fallout of liquid mist droplets attributed to the facility's operations. This letter is to document GPI's response to the violation notice and corrective actions that have been undertaken by GPI.

**Finding:** Based on sampling results, MDEQ states the liquid mist fallout comes from the Paper Machine No. 2 vacuum extraction process exhaust stack.

**GPI Response:** GPI does not agree with the MDEQ's assertion that the contaminants found on the citizen's car match the liquid mist fallout which comes from GPI's Paper Machine No. 2 vacuum process. GPI does not believe the dust sample analysis from the citizen's car verifies it came from GPI's vacuum system or other operations at the mill, as only thirty five percent of the dust sample contained paper fibers. Review of the sampling results also show that the sample from the dust collected on the citizen's car has twelve percent rubber dust content. GPI does not process rubber in the Paper Machine No. 2 vacuum system or in the other paper making process at the mill. It is also unlikely that any biological sources, glass resin, or other vegetative particles identified in the dust sample from the citizen car can be attributed to the GPI location.

Therefore, it is unlikely that the dust on citizen's car would have come from GPI operations judging from the sample results. GPI has decided to implement the following corrective actions immediately to mitigate any liquid mist fallout from the Paper Machine No. 2 vacuum system:



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1. Implement administrative controls and to reduce the air flow to the fan in the paper machine No. 2 Vacuum System.
2. Conduct more frequent observations of the fans exhaust and take corrective actions as necessary.

GPI is also looking into evaluating rerouting piping to exhaust the discharge to an alternate location and is investigating mist eliminating equipment technology as a possible solution.

If there are any questions, please feel free to contact me or David Likens, HSE Manager, at 269-282-2145 or via email at [david.likens@graphicpkg.com](mailto:david.likens@graphicpkg.com).

Thank you,

*Ronald Fox*

**Mill Manager**

Graphic Packaging International, LLC - Battle Creek, MI

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