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STATE OF MICHIGAN  
MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT  
LAKES, AND ENERGY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

January 22, 2021

UPS NEXT DAY DELIVERY

**ENFORCEMENT NOTICE**

In the matter of:

Graphic Packaging International, LLC  
1500 North Pitcher Street  
Kalamazoo, Michigan 49007

SRN: B1678; Kalamazoo County

ATTENTION: Mr. Richard Townley

As you are aware in July 2019, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) commenced an escalated enforcement action against Graphic Packaging International, LLC (GPI). After initial enforcement discussions it was determined the best path forward was to suspend enforcement negotiations while GPI designed and performed an Odor Investigation Study. The Odor Investigation Study has been completed and the final report was submitted to the AQD on November 3, 2020. Additionally, on December 30, 2020, GPI submitted an Odor Minimization Plan to the AQD describing how GPI will address areas of concern identified during the Odor Investigation Study.

The AQD is now providing GPI an opportunity to reengage to formally resolve the violations listed in the July 8, 2019 Enforcement Notice and the November 20, 2020 Violation Notice through the entry of a legally enforceable agreement that will include a compliance program and payment of an appropriate monetary penalty pursuant to Section 5528 of Part 55 of NREPA, MCL 324.5528. This will also act as an opportunity for the AQD to provide comments and questions the AQD has regarding the Odor Investigation Study and Odor Minimization Plan.

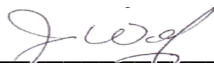
Mr. Richard Townley

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Please contact me at 517-275-0943, or by email at WolfJ2@Michigan.gov, no later than Tuesday, February 2, 2021, to schedule a meeting to discuss the resolution of this matter.

STATE OF MICHIGAN  
MICHIGAN DEPARTMENT OF ENVIRONMENT,  
GREAT LAKES, AND ENERGY

By: \_\_\_\_\_  
Jason Wolf  
Air Quality Division, Enforcement Unit

Date: January 22, 2021

cc: Mr. John Byl, Warner Norcross & Judd LLP  
Ms. Sarah Marshall, U.S. EPA, Region 5  
Mr. Neil Gordon, MDAG  
Mr. Rex Lane, EGLE  
Ms. Jenine Camilleri, EGLE