

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

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|--------------------------------------------------------------------------------|---------------------------------------|
| Facility : GRAPHIC PACKAGING INTERNATIONAL LLC | SRN : B1678 |
| Location : 1500 N. PITCHER ST. | District : Kalamazoo |
| | County : KALAMAZOO |
| City : KALAMAZOO State: MI Zip Code : 49007 | Compliance Status : Compliance |
| Source Class : MAJOR | Staff : Monica Brothers |
| FCE Begin Date : 3/31/2017 | FCE Completion Date : 4/2/2018 |
| Comments : The company was in compliance at the time of the inspection. | |

List of Partial Compliance Evaluations :

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|-----------------------------------------------------------------------------------------------------------------------|
| 04/02/2018 | Scheduled Inspection | Compliance | Unannounced scheduled inspection |
| 03/21/2018 | ROP SEMI 2 CERT | Compliance | The company reports compliance with all requirements for the period. |
| 03/21/2018 | ROP Annual Cert | Compliance | The company reports compliance with all requirements for the period. |
| 03/21/2018 | MAERS | Compliance | Company certifies that they have submitted a complete 2016 MAERS report. |
| 03/21/2018 | ROP SEMI 2 CERT | Compliance | The company reports compliance with all requirements for the period. |
| 03/21/2018 | ROP Annual Cert | Non Compliance | Company reports Rule 901 violations that occurred on 01-27-17, 03-16-17, and June 19, 20, and 27, 2017. |
| 03/21/2018 | Excess Emissions (CEM) | Compliance | Summary of full 2017 Excess Emissions. See quarterly submissions for details on CEM downtime and cylinder gas audits. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-------------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 03/21/2018 | Other Non ROP | Compliance | Rule 215(5) Notification of Change. The facility reports that the company name has changed from Graphic Packaging International, Inc. to Graphic Packaging International, LLC. They also report that a new mill manager was assigned to the facility on February 14, 2018, named Richard W. Townley. They also cited Rule 216(1)(a)(i-iv) for these changes, but these changes do not constitute an Administrative Amendment or Modification because there was no change in ownership. |
| 02/23/2018 | Complaint Investigation | Compliance | Investigation of an odor complaint that was reported at about 12:30pm. |
| 02/02/2018 | Excess Emissions (CEM) | Compliance | Monthly SO2 emissions and % sulfur in fuel oil for Boiler 9. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting for Boiler 9. Includes cylinder gas audit. They reported no CEM monitor equipment malfunctions or downtime for this quarter. |
| 01/09/2018 | Complaint Investigation | Compliance | Investigation of an odor complaint that was called in at about 6:15am on January 9, 2018. |
| 11/02/2017 | Excess Emissions (CEM) | Compliance | Monthly SO2 emissions and % sulfur in fuel oil for Boiler 9. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting for Boiler 9. Includes cylinder gas audit. They reported 2 total CEM monitor equipment malfunctions, which equated (0.09%) of total CEMS downtime. |
| 09/13/2017 | ROP Semi 1 Cert | Compliance | The company reports compliance with all requirements for the period. |
| 09/13/2017 | ROP Semi 1 Cert | Non Compliance | Company reports Rule 901 violations that occurred on 01-27-17, 03-16-17, and June 19, 20, and 27, 2017. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 09/13/2017 | Excess Emissions (CEM) | Compliance | Excess emissions report for EUBOILER#9, quarters 1 and 2. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting. Includes cylinder gas audit. |
| 08/23/2017 | Complaint Investigation | Compliance | Investigation of a complaint that was called in at about 7:00am. |
| 08/16/2017 | CEM RATA | Compliance | 2017 RATA report for boiler 9 NOx, CEMS. The test was conducted and completed on April 11, 2017. |
| 08/02/2017 | Excess Emissions (CEM) | Compliance | Excess emissions report for Boiler 9. Monthly SO2 emissions and % sulfur in fuel oil. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting for Boiler 9. They reported a total of 5 hours of CEMS downtime (0.24% of total operating time). |
| 07/31/2017 | Complaint Investigation | Compliance | Investigation of a complaint that was called in at about 7:00am. |
| 06/27/2017 | Complaint Investigation | Non Compliance | Investigation of two odor complaints that were called in at 6:34am and 7:54am. |
| 06/20/2017 | Complaint Investigation | Non Compliance | Investigation of two odor complaints that were called in at about 6:30am and 12:35pm. |
| 06/19/2017 | Complaint Investigation | Non Compliance | Investigation of an odor complaint that was called in around 6:45am. |
| 05/25/2017 | CEM RATA | Compliance | 2017 RATA and second quarter linearity check report for boiler 8 NOx, CEMS. The test was conducted and completed on April 10, 2017. |
| 05/09/2017 | Excess Emissions (CEM) | Compliance | Excess emissions report. Monthly SO2 emissions and % sulfur in fuel oil. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting. Includes cylinder gas audit and quarterly linearity check. They reported 11 total CEM monitor equipment malfunctions, which equated to 11 hours (0.52%) of total downtime. |
| 04/17/2017 | Complaint Investigation | Compliance | Investigation of complaint that was called in at 7:14am. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|---------------------------|-------------------|------------------------------------------------------------|
| 04/10/2017 | Stack Test Observation | Compliance | RATA tests for both Boilers 8 and 9 on 4-10-17 and 4-11-17 |

Name: Mari RA Date: 4/24/18 Supervisor: MD 4/24/2018