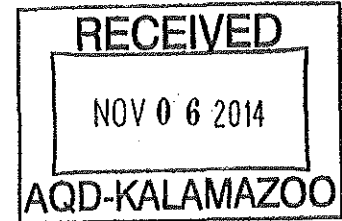




November 5, 2014

Ms. Dorothy Bohn
Senior Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division - Kalamazoo District Office
7953 Adobe Road
Kalamazoo, Michigan 49009

RE: Graphic Packaging International, Inc.
1500 North Pitcher Street, Kalamazoo, Michigan
ROP Permit Number MI-ROP-B1678-2010b
SRN: B1678



Dear Ms. Bohn:

Graphic Packaging International, Inc. (GPII) is providing this information in response to a violation notice from the Michigan Department of Environmental Quality (MDEQ) dated October 20, 2014 regarding the operation of the waste water treatment plant (WWTP) at GPII's paperboard manufacturing facility in Kalamazoo, Michigan. The violation notice stated that on October 9, 2014, MDEQ representatives conducted an inspection of the area around GPII's WWTP (Paterson Street and Harrison Court) and a nearby business area to investigate a complaint regarding foul odors and traced the source of the odors back to GPII's WWTP.

Per the violation notice and associated Complaint Report, MDEQ made nuisance odor observations at the Borgess Neurosurgery of Kalamazoo building around 08:30 AM to 8:45 AM the morning of October 9, 2014. GPII personnel were not present during the MDEQ observations. However, GPII personnel had toured this area at 7:30 AM on October 9th as part of an ongoing daily odor evaluation process and did not detect any odors. In addition, GPII personnel toured the area around Borgess Neurosurgery at 10:12 to 10:22 AM (after being notified of the odor issue by MDEQ) and again did not observe any odors. In reviewing meteorological and observational data collected on October 9th, winds were generally calm to northerly in the area which, when considering the relative locations of the GPII WWTP and Borgess Neurosurgery facility, does not support the conclusion that the source of the odor was the GPII WWTP (see Attachment: Weather/Odor Data Summary Table for October 9, 2014).

GPII takes the alleged odor violation very seriously and are continuing our due diligence efforts to identify whether any part of our operations could be a contributor to the reported odor. As part of these efforts, GPII has initiated a trial period with a new chemical vendor to manage the chemical addition program at the mill WWTP. GPII is also working with the City of Kalamazoo to identify potential hydraulic improvements to the waste water discharge system to the City's Water Reclamation Plant to rule out the potential for venting of odorants from the City's sewer line.



If you have any questions or need any additional information please contact Mr. Donald Krug with GPII directly at 269-383-5440.

Sincerely,

Graphic Packaging International, Inc.

A handwritten signature in black ink, which appears to read "Scott LeBeau".

Scott LeBeau
Mill Manager

Attachment: Weather/Odor Data Summary Table for October 9, 2014