

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY





DIRECTOR

February 2, 2017

Mr. Scott LeBeau Graphic Packaging International, Inc. 1500 North Pitcher Street Kalamazoo, Michigan 49007

SRN: B1678, Kalamazoo County

Dear Mr. LeBeau:

VIOLATION NOTICE

On January 27, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a complaint investigation of Graphic Packaging International, Inc. (Facility), located at 1500 North Pitcher Street, Kalamazoo, Michigan. The purpose of this investigation was to determine the Facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1678-2015; and to investigate a recent complaint that the DEQ, AQD, received on January 27, 2017, regarding foul odors attributed to operations at the Facility.

During the inspection, staff of the AQD observed the following:

| | Rule/Permit | |
|---------------------|--|--|
| Process Description | Condition Violated | Comments |
| Mill Operations | R 336.1901 (Rule 901) and and General Condition 12(b), Section 1, of MI-ROP-B1678- 2015 | Strong and persistent odors were detected offsite. |

In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency, and duration so as to constitute a violation of Rule 901 and General Condition 12(b), Section 1, of MI-ROP-B1678-2015. The AQD staff detected odors east of the Facility along Riverview Drive in Kalamazoo, Michigan.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 23, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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If the Facility believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,

Monica Brothers

Environmental Quality Analyst

Monica Broth

Air Quality Division 269-567-3552

MB:CF

cc: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Christopher Ethridge, DEQ

Mr. Thomas Hess, DEQ

Ms. Mary Douglas, DEQ