



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GRETHUR  
DIRECTOR

June 29, 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 June 27, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a complaint investigation of Graphic Packaging (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 number MI-ROP-B1678-2015; and to investigate a recent complaint that the DEQ, AQD, received on June 27, 2017, regarding foul odors attributed to Facility operations.

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

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

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 and in the Riverside Cemetery, Kalamazoo, Michigan.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 20, 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,

A handwritten signature in black ink, appearing to read "Monica Brothers", with a stylized flourish at the end.

Monica Brothers  
Environmental Quality Analyst  
Air Quality Division  
269-567-3552

MB:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Mary Douglas, DEQ