



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

November 20, 2020

Mr. Thomas Olstad
Graphic Packaging International, LLC
1500 North Pitcher Street
Kalamazoo, Michigan 49007

SRN: B1678, Kalamazoo County

Dear Mr. Olstad:

VIOLATION NOTICE

On November 17, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a site investigation of Graphic Packaging International, LLC's new construction site located at 1500 North Pitcher Street, Kalamazoo, Michigan. The purpose of this site 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; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1678-2015;

During the site investigation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Unpermitted Construction of New Boilers	R 336.1201 (Rule 201), and R 336.2802(3) (Rule 1802, Subrule 3)	Facility began actual construction of footings and foundation for two new boilers without a Permit to Install.

During this site investigation, it was noted that Graphic Packaging had begun actual construction at this facility for two new boilers without first obtaining a Permit to Install. It was observed that the foundation and footings for these two new boilers were present at the time of the investigation. The AQD staff advised the facility on November 10, 2020, that this is a violation of Rule 201 and Rule 1802 of the administrative rules promulgated under Act 451. This letter is attached. Pursuant to Rule 1801(e), "begin actual construction", means, in general, initiation of physical on-site construction activities on an emissions unit which are of a permanent nature. Such activities include, but are not limited to, installation of building supports and foundations, laying of underground pipework, and construction of permanent storage structures".

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 11, 2020 (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.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Graphic Packaging International, LLC 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 and for the cooperation that was extended to us during our site investigation of the facility. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Monica Brothers

Monica Brothers
Senior Environmental Quality Analyst
Air Quality Division
269-312-2535

Attachment

cc:

Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE