



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GRETHER  
DIRECTOR

April 5, 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 March 16, 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 MI-ROP-B1678-2015 ; and to investigate a recent complaint that the AQD received on March 16, 2017, regarding fallout attributed to the Facility's 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 No. 12, Section 1, of MI-ROP-B1678-2015	Lab analysis of fallout at complainant's property shows that the Facility is the source. See attached lab results, which show calcite as a large percentage of the sample.

During the complaint investigation, AQD staff took two samples of the fallout material at the complainant's property. Lab analysis of this material showed that the Facility is the source. In the professional judgment of AQD staff, the fallout that was observed would constitute a violation of Rule 901 and General Condition No. 12, Section 1, of MI-ROP-B1678-2015. On the day of the investigation, pictures of the fallout were supplied to the Facility. Enclosed is a copy of the lab results.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 26, 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

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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.

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  
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