



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GRETHER  
DIRECTOR

April 17, 2018

Mr. Richard Townley  
Graphic Packaging International, LLC  
1500 North Pitcher Street  
Kalamazoo, Michigan 49007

SRN: B1678, Kalamazoo County

Dear Mr. Townley:

**VIOLATION NOTICE**

On April 16, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a complaint investigation of Graphic Packaging International, LLC (Facility), located at 1500 North Pitcher Street, Kalamazoo, Michigan. The purpose of this inspection 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 April 16, 2018, 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 at Borgess Medical Center, along Riverview Drive and the recreational trail that runs parallel to the river, and in the Riverside Cemetery in Kalamazoo, Michigan.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 8, 2018 (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

Mr. Richard Townley  
Page 2  
April 17, 2018

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.

**In addition to the response to this violation notice, please develop and submit to the DEQ an Odor Management Plan that details how odors will be mitigated in the future. Please also submit the Facility's odor-reducing chemical usage records for the clarifier.**

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 long horizontal flourish extending to the right.

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

MB:CF

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Malcolm Mead-O'Brien, DEQ  
Ms. Mary Douglas, DEQ