



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 14, 2019

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

SRN: B1678, Kalamazoo County

Dear Mr. Townley:

VIOLATION NOTICE

On May, 1, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation of Graphic Packaging International, LLC 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 which we received on May 1, 2019, regarding foul odors attributed to facility operations.

During the investigation, staff 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 the recreational trail that runs parallel to the river, and in the Riverside Cemetery in Kalamazoo, MI.

Mr. Richard Townley
Graphic Packaging International, LLC
Page 2
May 14, 2019

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 3, 2019 (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. 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
Environmental Quality Analyst
Air Quality Division
269-567-3552

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