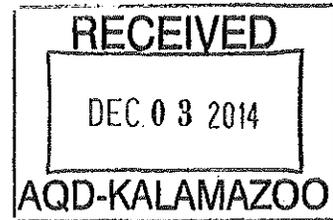




December 3, 2014

Ms. Dorothy Bohn  
Senior Environmental Quality Analyst  
Michigan Department of Environmental Quality  
Air Quality Division - Kalamazoo District Office  
7953 Adobe Road  
Kalamazoo, Michigan 49009

RE: Graphic Packaging International, Inc.  
1500 North Pitcher Street, Kalamazoo, Michigan  
ROP Permit Number MI-ROP-B1678-2010b  
SRN: B1678



Dear Ms. Bohn:

Graphic Packaging International, Inc. (GPII) is providing this information in response to a violation notice from the Michigan Department of Environmental Quality (MDEQ) dated November 12, 2014 regarding the waste water treatment plant (WWTP) at GPII's paperboard manufacturing facility in Kalamazoo, Michigan. The violation notice stated that on November 7, 2014, MDEQ representatives conducted an inspection of the GPII's WWTP facility at 1500 North Pitcher Street, Kalamazoo to investigate a complaint regarding foul odors and traced the source of the odors back to GPII's WWTP. MDEQ alleges that the observed odors were of sufficient intensity, frequency and duration to constitute a violation of Rule 901.

Based on a review of available meteorological data corresponding to the time when complaint identified foul odors at Borgess Neurosurgery, our internal observations from the daily odor tour performed by mill personnel, and our observations during the on-site review performed by MDEQ personnel, GPII does not believe the data developed during the course of this investigation supports a conclusion that GPII's WWTP was the definitive source of the foul odors and that the odors were of sufficient intensity, frequency and duration to constitute a violation of Rule 901. Meteorological data cited by GPII in this letter is derived from the Kalamazoo Boardmill Weather Station which we believe is much more representative of local conditions compared to the station at the Kalamazoo Airport which is located 5 miles away to the south. In reviewing the available meteorological and observational data from November 7th, winds were generally light from the north-northwest (NNW) in the area from midnight through about noon. Between noon and 1:00 PM the wind changed to a west-southwest (WSW) direction but was generally variable. From the MDEQ Complaint Investigation Report (CIR), between about 12:55 to 1:30 PM, MDEQ reports observed winds to be from the southwest (SW). Per the MDEQ CIR, Borgess Neurosurgery personnel stated that on November 7th, "the odor was strong earlier and was bad all morning". Given the meteorological data which shows during the morning (up until noon) that the prevailing wind would be directing any potential odors from the vicinity of the GPII WWTP away from Borgess Neurosurgery and to the south-southeast (SSE), it is unclear how the foul odors identified in the Borgess Neurosurgery complaint would emanate from the GPII WWTP. The morning meteorological data supports our observations during the

daily odor tour which did not detect any odor in the vicinity of Borgess Neurosurgery at 7:00 AM.

During the time MDEQ spent on-site at the GPII WWTP reviewing the operations and checking for potential odors, the collective observations from GPII personnel were that any "foul" odors commented on by MDEQ personnel were of a transient, intermittent, and mild intensity. GPII personnel recall two locations (on the north of the clarifier and on the east side of the old filter building) where MDEQ personnel identified detecting "the odor" although the odor was not of sufficient duration or intensity to be confirmed by GPII personnel. The one location where GPII and MDEQ personnel both commented on detecting a "foul" odor was at Industrial Chamber #1 on the City of Kalamazoo Water Reclamation Plant property which GPII believes raises the possibility of some venting from the City's collection system given the same strong odor was not present on the discharge from the clarifier at the GPII WWTP. Given the observations collected during the on-site review with MDEQ, it is unclear how transient, intermittent and weak odors in the vicinity of the GPII WWTP and the City of Kalamazoo WWTP would concentrate for an extended period of time at an upwind location approximately one-half a mile away (Borgess Neurosurgery).

As communicated to MDEQ during the on-site review, GPII takes the alleged odor violation very seriously and are continuing our due diligence efforts to identify whether any part of our operations could be a contributor to the reported odor(s). As part of these efforts, GPII initiated a trial period with a new chemical vendor to manage the chemical addition program at the mill WWTP. However, GPII remains in control of all WWTP management decisions and activities. These trial efforts and resultant information/data analysis are ongoing. GPII is also continuing to work with the City of Kalamazoo to identify potential hydraulic improvements to the waste water discharge system to the City's Water Reclamation Plant to rule out the potential for venting of odorants from the City's sewer line.

If you have any questions or need any additional information please contact Mr. Donald Krug with GPII directly at 269-383-5440.

Sincerely,

*Graphic Packaging International, Inc.*



Scott LeBeau  
Mill Manager

Attachment: Weather/Odor Data Summary Table for November 7, 2014