

June 8, 2015

Ms. Mary Douglas
Michigan Department of Environmental Quality
Supervisor - 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-B1678-2015
SRN: B1678

Dear Ms. Douglas:

Graphic Packaging International, Inc. (GPII) is providing this update/status letter in follow-up to information contained in our April 23, 2015 initial response letter to an MDEQ Violation Notice dated April 6, 2015. Please refer to these letters for relevant background and details in this matter.

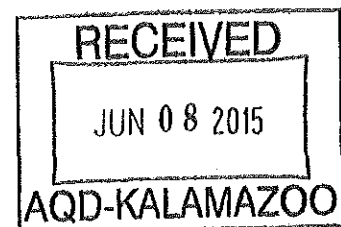
To summarize, the MDEQ Violation Notice referenced above asked the Mill to do several things noted by the bulleted items below:

- Initiate actions necessary to correct the cited violation;

The response actions we have taken along with steps taken to prevent any reoccurrence are detailed below:

- Submit a written response to this Violation Notice by April 23, 2015 to 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.

GPII response - A written response to the Violation Notice addressing the required sub-bulleted items above was submitted to MDEQ on April 23, 2015 – please refer to this letter for the relevant details.



April 7, 2015 ~ Mill Environmental Engineer began including a ground level visual emissions check (VE) of process emission points in his standard facility daily rounds. To date no particulate VE has been observed. **(Completed/Ongoing)**

April 7, 2015 ~ Mill management group and Environmental Engineer began meeting multiple times per week to discuss this issue, to evaluate current status/conditions, to address/complete past action items and to generate/plan any new appropriate action items to be initiated. **(Completed/Ongoing)**

April 7, 2015 ~ Conducted an audit and prepared an inventory listing of primary Mill emissions points for use in the investigation process. **(Completed)**

April 7, 2015 ~ Mill reviewed the MDEQ analytical results to be able to potentially correlate these sample characteristics with future facility sampling results. **(Completed)**

April 8, 2015 ~ Treatment of two vacuum receiver boxes on the K1 paper machine vacuum system with a defoamer product to address any potential foaming that could possibly be picked up out of the vacuum box and discharged to atmosphere. These two vacuum receiver boxes conduct vacuum pump discharge to two exhaust stacks at K1 that are under evaluation. **(Completed)**

April 13, 2015 ~ Confirmed arrangement with a Mill selected laboratory to conduct quantitative and qualitative analysis on any samples as deemed appropriate. **(Completed)**

April 16 ~ Fabrication and installation of monitoring stands to facilitate fallout monitoring and sampling at selected ground level locations for subsequent testing and evaluation. These monitoring stations are checked on a daily basis. **(Completed/Ongoing)**

April 20 ~ Fabrication and deployment of monitoring devices to facilitate fallout monitoring and sampling at selected stack/vent locations for subsequent testing and evaluation. These monitoring stations are checked on a daily basis. **(Completed/Ongoing)**

April 28 ~ During a K1 paper machine maintenance event; opened, cleaned and evaluated two vacuum receiver boxes and associated with stacks on the K1 paper machine vacuum system. **(Completed)**

Result - No sludge accumulation and no deficiencies were found.

May 4-8, 2015 ~ Paper machine vacuum systems expert audited the K1 vacuum system for potential issues. **(Completed)**

Result - Design and performance of vacuum discharge system were found to be within design criteria.

Additional action item to be conducted:

June 9, 2015 ~ During a K1 paper machine maintenance event scheduled for this date, a paper machine subsystem discharge line will be redirected to guard against possible pick-up and discharge of system drainage.

Findings/conclusions:

Since the Violation Notice, no additional reported particulate/fallout complaints have been communicated to GPII, spanning a period of two and a half months. Additionally, our onsite particulate monitoring has not revealed any events that are similar in nature and characteristics which can be correlated with those reported in the April 6, 2015 NOV.

It appears that the conditions that resulted in the fallout events cited in the NOV were transient and are not routine. We further believe that since we have not detected signs of this type of "fallout", that GPII may not have been the source.

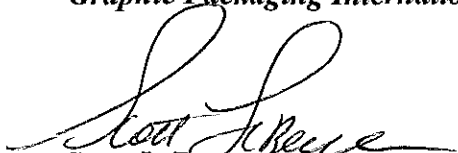
However, we believe that the actions we have taken along with our additional planned actions, represent responsible and reasonable due diligence actions to ensure to the extent practicable that no part of our operation emits problematic amounts of particulate material. We believe that our combined actions have effected resolution of this NOV. However, as a conservative measure, we propose to continue to monitoring for potential recurrence of a particulate matter emission event for an additional 45 days. If no further incidents occur, we will provide a final update report at that time for submittal to MDEQ.

We wish to thank you for your continued understanding during our efforts to identify the potential source of this complex problem.

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