

June 3, 2019

Ms. Monica Brothers
Environmental Quality Analyst
Michigan Department of Environment, Great Lakes
and Energy - Air Quality Division Kalamazoo
District Office 7953 Adobe Road
Kalamazoo, Michigan 49009



RE: Graphic Packaging International, LLC.
1500 North Pitcher Street, Kalamazoo, Michigan
ROP Permit Number MI-ROP-B1678-2015 SRN:
B1678

Dear Ms. Brothers:

Graphic Packaging International, LLC (GPI) is providing this information in response to the Violation Notice issued to GPI by the Michigan Department of Environment, Great Lakes and Energy (EGLE) on May 14, 2019, based on an EGLE odor complaint investigation conducted on May 1, 2019. Specifically, the EGLE Violation Notice requests that GPI discuss the date the alleged Rule 901 odor occurred, an explanation of the causes and duration of the alleged violation, whether the alleged 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 recurrence. EGLE's Violation Notice also directs GPI to provide appropriate factual information to explain why the Company believes the observations or statements in the Violation Notice are inaccurate or do not constitute violation of the applicable legal requirements cited.

EGLE first advised GPI at approximately 1:30PM after arriving at GPI's Kalamazoo mill that an odor complaint was received by EGLE at about 8:00 AM on May 1, 2019. EGLE commented during their inspection at the mill that the complaint location was east to northeast from the mill and the odor reported was of a "fermented" character. Although not noted in the Violation Notice, while onsite EGLE commented that this reported "fermented" odor may be emanating from elevated process stacks.

After being notified by EGLE of the odor complaint, GPI took the following actions to evaluate the observations reported by EGLE and the potential for GPI's operations to be a source of the off-site odors:

1. GPI personnel conducted area tours on May 1, 2019 at about 1:30, 2:00 and 2:40 PM. During these tours GPI personnel could not verify any strong or persistent odors as described by EGLE.
2. GPI personnel reviewed the wind direction data recorded at the GPI mill weather station on May 1, 2019 from 5:00 AM through 1:30 PM (see attached GPI Mill Weather Station Data May 1, 2019 from 0500-1330). This data shows that the winds from early morning hours through at around 9:30 AM were from the east and southeast (generally blowing to the west and northwest) and then changed to more south-southwest direction later in the day. This data does not support the conjecture that mill was the source of odor early in the day at a location that lies to the east or northeast.



3. GPI personnel discussed EGLE's observation/conclusion that the "fermented" odor was likely emanating from elevated process stacks but our knowledge of mill processes as well as by past direct observational experience related to emissions from various elevated stacks does not support such a supposition. Paperboard production data for May 1 shows that there were no paper machine upsets that could potentially cause unusual odors to be emitted from the process stacks (see the attached May 1-2019 Daily Stats Report-Kalamazoo Mill).

4. GPI personnel evaluated the operation of the Mill Waste Water Treatment Plant (WWTP) and found the WWTP was operating within the established guidelines and parameters with a nearly neutral pH throughout the day and no operational upsets which were reported or indicated per the WWTP daily log for May 1 (see attached May 1-2019 WWTP log).

5. GPI personnel evaluated the records of area tours performed in accordance by the mill's Odor Management Plan. Review of the records of area tours for potential odors completed between April 30th and May 2nd (see attached Kalamazoo Mill Odor Tracking Log April 30-May 2, 2019) did not identify any unusual problems or process upsets which may have potentially resulted in significant off-site odors.

Based on the results of the investigation activities detailed above, GPI was unable to identify any operational evidence connecting GPI's Kalamazoo mill to the source of the odor complaint received by EGLE on May 1, 2019. The various elements of the investigation are consistent with the evaluation process detailed in the mill's Odor Management Plan which was previously submitted to EGLE. Although not agreeing the mill was the source of odors reported to EGLE on May 1, GPI remains committed to operating in a responsible manner and continuing to take all appropriate measures to minimize any potential off-odors.

GPI appreciates and continues to request that EGLE notify us promptly upon learning of these concerns which enables us to thoroughly investigate the situations promptly. If you have any questions or need any additional information, please contact Mr. Donald Krug with GPI directly at 269-383-5440.

Sincerely,

A handwritten signature in blue ink that reads "Richard W. Townley".

Richard W. Townley
Resident Mill Manager

CC: Ms. Jenine Camilleri, Enforcement Supervisor, EGLE-AQD

Attachments:

Kalamazoo Mill Odor Tracking Log April 30-May 1, 2019

GPI Mill Weather Station Data May 1, 2019 from 0500-1330

May 1-2019 WWTP log

May 1-2019 Daily Stats Report_ Kalamazoo Mill

Odor Types (estimate of degree or strength):

Date:	Entered By:	Municipal	Wet OCC	GPI Sludge Pile	GPI H2S	Observed at (location):	Comments:
4/30/2019	Krug	0	0	0	0	N/A	0500 wind calm.
5/1/2019	Krug	0	0	0	0	N/A	0500 wind calm.
5/1/2019	Krug	0	0	0	1	Riverview	1340 wind variable S-SW-W @ 5-10. Toured Riverview area w/EGLE.
5/1/2019	Krug	0	0	0	1	Riverview	1400 wind variable S-SW-W @ 5-10.
5/1/2019	Krug	1	0	0	1	Riverview	1440 wind variable S-SW-W @ 5-10.
5/1/2019	Krug	3	0	0	0	Riverview	Comment logged per R. Miller - Last night at 8:45 pm, the Gull Rd and Riverview intersection had a strong city odor. It lasted about half way up the Gull Rd hill.
5/2/2019	Krug	2	0	0	0	Paterson Street	Comment logged per R. Miller - I smelled the city on Paterson at General Chem—not at the River or south of WWTP.
5/2/2019	Krug	0	0	1	1	Paterson Street	0435 wind N-NE 0-5.
5/2/2019	Krug	1	0	0	1	Paterson Street	0715 wind variable N-E 0-5.
5/2/2019	Krug	0	0	0	0	N/A	1330 wind W 0-5.

GPI Mill Weather Station Data May 1, 2019 from 0500-1330

Time	Wind Dir °	Wind Spd mph	Wind Gust mph
5:00	144	0	7
5:02	84	2	4
5:04	75	2	4
5:06	161	2	4
5:08	148	1	4
5:10	91	4	6
5:12	107	0	6
5:14	98	2	6
5:16	91	3	6
5:18	112	1	8
5:20	125	5	9
5:22	78	2	9
5:24	111	4	9
5:26	140	2	9
5:28	101	2	9
5:30	130	1	9
5:32	147	2	7
5:34	139	2	7
5:36	65	0	7
5:38	159	2	7
5:40	121	0	7
5:42	125	1	7
5:44	119	3	7
5:46	112	4	7
5:48	110	3	8
5:50	113	3	8
5:52	129	1	8
5:54	82	2	8
5:56	165	0	8
5:58	136	2	8
6:00	124	3	8
6:02	144	4	10
6:04	107	4	10
6:06	129	2	10
6:08	145	6	10
6:10	144	4	10
6:12	94	3	10
6:14	136	1	10
6:16	143	2	10
6:18	147	9	10
6:20	125	5	10
6:22	170	7	10

6:24	140	3	10
6:26	74	4	10
6:28	153	3	10
6:30	142	2	10
6:32	98	2	6
6:34	93	4	6
6:36	94	4	8
6:38	97	7	9
6:40	93	3	9
6:42	120	1	9
6:44	77	3	9
6:46	109	7	9
6:48	119	1	9
6:50	104	3	9
6:52	88	5	9
6:54	145	6	9
6:56	113	4	9
6:58	100	4	9
7:00	107	9	11
7:02	119	7	10
7:04	147	2	10
7:06	121	2	10
7:08	115	2	10
7:10	95	6	10
7:12	130	5	10
7:14	127	2	10
7:16	86	4	10
7:18	150	3	10
7:20	87	9	10
7:22	105	6	11
7:24	121	8	13
7:26	133	10	13
7:28	105	3	13
7:30	199	3	13
7:32	112	1	14
7:34	61	8	14
7:36	88	2	14
7:38	177	5	14
7:40	140	3	14
7:42	113	3	14
7:44	159	2	14
7:46	145	2	14
7:48	82	4	14
7:50	172	5	14
7:52	88	1	14
7:54	156	2	14
7:56	141	2	14

7:58	119	4	14
8:00	89	2	14
8:01	124	1	10
8:04	175	3	10
8:06	120	2	10
8:08	129	3	10
8:10	86	2	10
8:12	154	1	10
8:14	140	4	10
8:16	121	5	10
8:18	129	2	10
8:20	124	5	10
8:22	97	3	10
8:24	133	3	10
8:26	103	6	10
8:28	120	4	10
8:30	98	2	10
8:32	180	2	5
8:34	140	2	5
8:36	95	4	5
8:38	117	0	5
8:40	132	5	5
8:42	136	2	7
8:44	125	4	7
8:46	134	3	7
8:48	156	7	8
8:50	67	8	9
8:52	193	2	12
8:54	178	5	12
8:56	149	1	12
8:58	119	1	12
9:00	107	3	12
9:02	137	3	5
9:04	112	4	5
9:06	155	4	5
9:08	150	3	5
9:10	133	1	5
9:12	119	4	7
9:14	100	4	8
9:16	161	2	8
9:18	146	5	8
9:20	163	5	8
9:22	123	1	8
9:24	140	2	8
9:26	138	1	8
9:28	95	3	8
9:30	161	2	8

9:32	164	5	5
9:34	202	1	8
9:36	131	3	8
9:38	215	2	9
9:40	158	2	9
9:42	144	2	9
9:44	142	2	10
9:46	177	1	10
9:48	188	3	10
9:50	159	5	10
9:52	188	5	10
9:54	144	3	10
9:56	161	4	10
9:58	134	2	10
10:00	149	3	10
10:02	178	4	8
10:04	158	10	10
10:06	171	0	10
10:08	175	2	10
10:10	164	4	10
10:12	171	1	10
10:14	161	2	10
10:16	180	3	10
10:18	221	6	10
10:20	209	7	10
10:22	213	3	10
10:24	157	6	10
10:26	176	8	10
10:28	160	5	10
10:30	128	4	10
10:32	187	5	9
10:34	183	2	9
10:36	213	7	11
10:38	197	5	11
10:40	190	5	11
10:42	130	4	11
10:44	184	3	11
10:46	171	4	11
10:48	196	7	11
10:50	185	4	12
10:52	201	7	12
10:54	252	5	12
10:56	227	7	12
10:58	214	8	12
11:00	219	8	12
11:02	222	8	9
11:04	224	7	10

11:06	238	8	13
11:08	200	5	13
11:10	209	5	13
11:12	216	6	14
11:14	202	8	14
11:16	209	7	14
11:18	208	5	14
11:20	217	9	14
11:22	223	15	15
11:24	205	4	15
11:26	205	6	17
11:28	205	6	17
11:30	233	11	17
11:32	194	7	12
11:34	216	9	18
11:36	248	10	18
11:38	187	10	18
11:40	214	9	18
11:42	213	7	18
11:44	231	11	18
11:46	178	13	18
11:48	213	5	21
11:50	232	14	21
11:52	246	20	21
11:54	240	13	21
11:56	218	13	21
11:58	205	11	21
12:00	246	14	21
12:02	253	22	27
12:04	277	11	27
12:06	222	20	27
12:08	239	14	27
12:10	242	9	27
12:12	240	15	27
12:14	236	14	27
12:16	215	6	27
12:18	205	8	27
12:20	255	14	27
12:22	239	11	27
12:24	248	17	27
12:26	231	13	27
12:28	187	7	27
12:30	228	4	27
12:32	228	10	16
12:34	242	13	19
12:36	188	7	20
12:38	211	7	20

12:40	232	6	20
12:42	194	7	20
12:44	200	9	20
12:46	227	6	20
12:48	244	13	20
12:50	235	16	20
12:52	238	8	20
12:54	244	7	20
12:56	248	14	20
12:58	228	5	20
13:00	246	14	20
13:02	229	9	14
13:04	225	9	14
13:06	196	3	14
13:08	225	9	15
13:10	250	4	15
13:12	194	8	15
13:14	181	3	15
13:16	247	9	15
13:18	198	6	15
13:20	233	6	15
13:22	223	7	16
13:24	250	12	16
13:26	240	11	16
13:28	244	12	16
13:30	246	9	16

KALAMAZOO BOARDMILL

Wastewater Treatment Plant Log

Date: 05/01/19

Shift	Operator Initial's
1st	VG
2nd	ISO RW
3rd	KL

Condenser Pumps			
Position	Pressure, PSI	Amps	Time
North	0		
South			

Sludge Holding Tank Usage	
Time Start	
Time Stop	
Depth, ft.	

Time	Wet Well pH	Strainer Operation <small>Normal/Plugged/ Flooded</small>	Torque (x1000 ft. lbs.) <small>Maximum 50 (See Torque Mpt.)</small>	Sludge Blanket Depth, (in.)
OBG'S	6.3 - 8.0pH			
7:00 AM	6.67	N	12	12
8:00 AM	6.72	N	11	
9:00 AM	6.67	N	12	13
10:00 AM	6.76	N	13	
11:00 AM	6.67	N	14	16
12:00 PM	6.68	N	14	
1:00 PM	6.65	N	14	24
2:00 PM	6.74	N	14	
3:00 PM	6.66	N	13	28
4:00 PM	6.68	N	13	
5:00 PM	6.74	N	14	26
6:00 PM	6.82	N	13	
7:00 PM	6.74	N	12	28
8:00 PM	6.64	N	12	
9:00 PM	6.72	N	12	24
10:00 PM	6.78	N	13	
11:00 PM	6.76	N	13	28
12:00 AM	6.72	N	13	
1:00 AM	6.70	N	14	30
2:00 AM	6.76	N	13	
3:00 AM	6.67	N	13	24
4:00 AM	6.77	N	14	
5:00 AM	6.65	N	15 ³⁰¹	30
6:00 AM			15	
Daily Average			13	26

Process Flows	
City Discharge	3764115
Total, Gals	574 000
River make-Up	44314
Total, Gals	5400
Cond. Pumps	
Wet Well Flow	39.4M
Chemical	Gallons/Inches / Flow Rate
Caustic	850
Defoamer	2.2
Biocide	
Odor Control	1.2
Polymer, Cat.	137
Polymer, An.	185
Unusual Characteristics in Outfall Discharge	
Y/N	Time
N	7AM
N	3P
N	11P

Time	Clarifier Condition
7AM	"GOOD"
11P	LT JUNK

Shift	1st	2nd	3rd
Screw Press Run Time	6	JAWZ21 7 TO 7:00:00	3
Vacuum Drum	8	8	8
Filter Run Time			

H2S Reading		
Shift	Location	Reading
1st	AES	5
2nd	AES	1
3rd	AES	3

OR = outer ring, AES = AES room
City = Flume Res = Reservoir overflow

Avg. pH <small>6.2pH - 9pH</small>	Reading Location	pH and Temperature Readings			OBG's
		1st <small>DV/HH</small>	2nd <small>DV/HH</small>	3rd <small>DV/HH</small>	
6.75	City pH meter	6.75/6.42	6.74/6.4	6.76/6.4	< 6.2pH - 9.0pH
	CTR Ring pH	6.91	6.82	6.82	< 6.0pH - 9.0pH
	Clarified pH	6.75	6.28	6.85	< 6.0pH - 9.0pH
	Water Temp. High	115	Water Temp. Low	88	

Solids
Screw 51
Drum 26

Shift	Comments, Operating Problems, Safety
1st	4:00 RAN 200 SHOTS B10 SP FLOYD BURGER ALIQUOT SEND JUNK RECTOR 9:40
2nd	
3rd	Biocide @ 5:00 Am

Krug, Donald

From: LaForge, Eric
Sent: Monday, June 3, 2019 9:04 AM
To: Krug, Donald
Subject: FW: Daily Stats Report: Kalamazoo Mill

From: Servers, Kalamazoo
Sent: Thursday, May 02, 2019 9:01 AM
To: KAL-BRD
Subject: FW: Daily Stats Report: Kalamazoo Mill

From: Kalamazoo Mill
Sent: Thursday, May 2, 2019 8:00:18 AM (UTC-06:00) Central Time (US & Canada)
To: Servers, Kalamazoo
Subject: Daily Stats Report: Kalamazoo Mill

MILL	Kalamazoo Mill			
PRODUCTION DATE	05/01/2019			
Production Info	PM1		PM3	
	Daily	Avg.	Daily	Avg.
Good Tons	1004.9	1004.9	323.1	323.1
Off Grade Tons	14.3	14.3	0.0	0.0
Side Roll / Ribbon Tons	6.5	6.5	39.6	39.6
Total Production Tons	1025.8	1025.8	362.7	362.7
Total Budget Tons	1053.0	1053.0	353.0	353.0
Beater Tons	0.0	0.0	0.0	0.0
MSF (Excluding Beater)	28888.2	28888.2	6235.0	6235.0
Budget MSF	25518.0	25518.0	6935.0	6935.0
Downtime Minutes Info				
Lost Time	120.0		0.0	
Unplanned Downtime				
Planned Downtime				
Total Downtime	120.0		0.0	
Scheduled Shutdown				
Time Eff.	91.7		100.0	
Budgeted Time Eff.	91.4		94.2	
Shipment Info				
	Daily		Avg.	
Daily Shipments	1573.7		1573.7	
Inventory				
Prime Tons	19975.1			
Off Grade Tons	65.4			
Side Roll / Ribbon Tons	221.7			
Total Tons	20262.2			
PM1 Products Run for Production Date				
16 NB STAR, 18 NB GEN, 20 NB GEN, 16 NB USB, 18 NB STAR, 16 NB GEN				

PM3 Products Run for Production Date
28 NB UHZ, 30 NB GEN, 28 NB GEN
PM1 Explanation for Beater and Off Grade: Beater Limit > 10 AND Off Grade Limit > 10
8.15 Tons: oddlot : 3.20 Break Recovery
1.52 Tons: oddlot : 5.04 Slitter Jumped
4.67 Tons: oddlot : 5.06 Wrong Width
PM3 Explanation for Beater and Off Grade: Beater Limit > 10 AND Off Grade Limit > 10
PM3 Explanation for Total DT:Downtime Limit > 60 Minutes
PM1 Explanation for Total DT:Downtime Limit > 60 Minutes
15:48 - 120 MIN: Lost Time: Reel: DE Scabs/Debris: Sheet breaks at reel due to scab on drive side edge. Scab was caused by debris from a hole. Hole traced back to 3rd dryer section. Replaced yellow coater rope.
Version: 2.2.1 GPIKLBANSQL / Panther