



1500 N Pitcher St
Kalamazoo, MI 49009

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January 5, 2023

Monica Brothers
Michigan Department of the Environment, Great Lakes, and Energy (EGLE)
Air Quality Division
Kalamazoo District
7953 Adobe Road
Kalamazoo, MI 49009-5026

RE: Graphic Packaging International, LLC (SRN B1678)
Response to Violation Notice dated December 19, 2022

Dear Ms. Brothers,

On behalf of Graphic Packaging International, LLC ("GPI"), this letter responds to EGLE's Violation Notice dated December 19, 2022 ("VN"). GPI has several concerns with the alleged Rule 901 violation as described below. Moreover, GPI does not agree that a "wet cardboard" odor constitutes a Rule 901 violation under the circumstances described in the VN.

GPI was not given any notice of the investigation/inspection of the alleged odor or offered an opportunity to participate or observe the investigation/inspection. When notice was given five days later, it was too late to conduct an internal investigation of the process except for a review of normal process data tracking. Prompt notice would have given GPI the ability to immediately search for a source of the alleged odor. If a source was found, then an investigation into causes might have been successful.

GPI also disagrees that a level 3 odor constitutes a violation of Rule 901. It is GPI's view that a sustained level 4 odor is required before there is a violation of Rule 901.

To address the alleged odor, GPI will implement the plans described in the draft Rule 901 ACO, including adding continuous Dissolved Oxygen and ORP probes, upsizing and installing a permanent Oxygen supply system, and adding a hydrogen sulfide scrubber for portions of the facility.

If you have any questions or require additional information, please contact me via email
Tom.Olstad@graphicpkg.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Olstad', with a long horizontal flourish extending to the right.

Tom Olstad

Graphic Packaging International, LLC

By email and FedEx

Copy: Rex Lane – EGLE (By email only)

Steven Smock – GPI (By email only)

Susan L. Kuieck, PE – Fishbeck (By email only)

John Byl – Warner Norcross + Judd (By email only)

Jenine Camilleri, Enforcement Unit Supervisor at EGLE (By FedEx),
P.O. Box 30260, Lansing, Michigan 48909-7760