



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 8, 2022

Thomas Olstad
Graphic Packaging International, LLC
1500 North Pitcher Street
Kalamazoo, Michigan 49007

SRN: B1678, Kalamazoo County

Dear Thomas Olstad:

VIOLATION NOTICE

On July 28, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Graphic Packaging International, LLC (facility) 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 Permit to Install (PTI) number 133-19A; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1678-2015;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER#9	PTI No. 133-19A, Special Conditions I.1 and I.2	Records showed 37 hours of non-compliance with the 13.6 pph NOx limit and two non-compliance periods for the 0.06 lb/MMBTU NOx limit (24-hour average) during the period of August 20, 2022 to August 21, 2022. During this time period, reported emissions ranged from 14.2 pph to 26.6 pph and 0.074 lb/MMBTU to 0.126 MMBTU. Records also showed non-compliance with the 0.06 lb/MMBTU NOx limit (24-hour average) for July 15, 2021. Records show that on July 15, 2021, the 24-hour average lb/MMBTU for NOx was 0.08 lb/MMBTU. The July 15, 2021 exceedance was also not reported in an Excess Emissions Report or an ROP Certification Report.

EUBOILER#10	PTI No. 133-19A, Special Conditions I.2 and I.3. R 336.1331 40 CFR 52.21 (c) and (d)	Stack test report from testing that occurred on June 8, 2022 showed non-compliance with 0.004 lb/MMBtu emission limit for PM10/2.5. Based on the test report, the PM10/2.5 emission rate for EUBOILER#10 was 0.0046 lb/MMBTU.
EUK1MACHINE	MI-ROP-B1678-2015, Special Condition II.1	Records were insufficient to demonstrate compliance with this material usage limitation.
EUK3MACHINE	MI-ROP-B1678-2015, Special Conditions II.1	Records were insufficient to demonstrate compliance with this material usage limitation.
EUCALENDARHEAT1	PTI No. 133-19A, Special Condition IV.1.	Facility installed EUCALENDARHEAT1 with a maximum heat capacity of 5.46 MMBtu/hr, which exceeds the limit of 2.8 MMBtu/hr.
EUK2COOLINGTW1	PTI No. 133-19A, Special Condition VIII.1,2,3.	Facility installed three stacks for EUCCOOLINGTW1 with a maximum exhaust diameter over the 144-inch limit.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 29, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 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 violations cited above and for the cooperation that was extended to me during my inspection of the facility. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Thomas Olstad
Graphic Packaging International, LLC
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Sincerely,

Monica Brothers

Monica Brothers
Senior Environmental Quality Analyst
Air Quality Division
269-312-2535

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Steve Smock, GPI
Rex Lane, EGLE