



May 16, 2016

Ms. Amanda Chapel  
State of Michigan  
Department of Environmental Quality  
Air Quality Division  
7853 Adobe Road  
Kalamazoo, MI 49009-5025

Dear Ms. Chapel:

In response to the Letter of Violation, dated April 27, 2016, we will reply as follows:

FGSheetFed

Used cleaning rags are to be stored in closed containers. During the April 14<sup>th</sup> inspection the drums containing the used cleaning rags were being staged for a vendor pickup which occurs every Thursday afternoon. The crews did not follow proper procedures and failed to put lids on the drums. All crews have been retrained on our procedure with emphasis placed on the requirement to place lids on the drums at all times.

On Friday May 6<sup>th</sup> Americraft Carton, Inc. sent a written request to Mary Douglas requesting approval to use manufacturer's formulation data to determine volatile organic compound (VOC) content for the products used on our two lithographic presses.

The required record keeping for each type of VOC containing material used was interrupted by the unexpected departure of our QA Manager in early 2015. The usage information continued to be gathered but the calculations were not made or tracked on a monthly and/or 12-month rolling time period. With the assistance of the DEQ's Air Quality Division and the DEQ's Environmental Assistance Center (EAC) we have compiled the required usage information for the 12 month period April 1, 2015 to March 31, 2016; these records are enclosed with this response. We have also included the calculations for the VOC content of the fountain solutions, as applied. The total VOC's emitted during this 12 month period were substantially below the permitted annual level.

Adhesive Machines

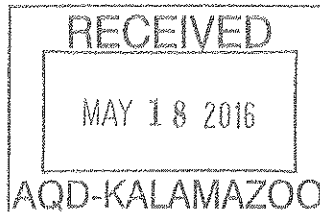
Based upon our calculations the adhesives usage of our glue lines does not meet the monthly limit of 200 gallons per month for Rule 287(c)(i) for the 12 month period April 1, 2015 to March 31, 2016. During this 12 month period we calculate the average monthly usage to be 207.34 gallons per month not including water. Due to the fact that we exceeded the allowable average of 200 gallons per month for this period we calculated the total VOC's emitted by the adhesives based upon manufacturer's VOC%. The total VOC's for the 12 month period for adhesives totaled 177.09 pounds.

With the continued assistance of the DEQ's Air Quality Division and Environmental Assistance Center (EAC) our plan is to use the knowledge gained by this experience to create a system to accurately calculate and track the required VOC information on a monthly and a 12-month rolling time period. We will also utilize the DEQ's support to convert our method of tracking and reporting Adhesive usage to the guidelines set forth under Rule 290 (R 336.1290) to prevent a reoccurrence of the current violations. Amy Ulmer, our recently hired Quality Control Manager, and I are working together on the development of this new system to provide each of us with a backup to avoid the circumstance that led to our present failure to track the required information.

Thank you very much for all of the assistance that you and Dennis provided during your inspection, and for the helpful answers that you have given to our many questions. We are confident that the information and training we have acquired in this process will enable us to report the emissions accurately in the years to come.

Sincerely,

John Westra  
Plant Manager  
Americraft Carton Inc.



Cc: Amy Ulmer – Quality Control Manager, Americraft Carton, Inc.  
Eric Hansen – Executive Vice President, Americraft Carton, Inc.