



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 19, 2022

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

SRN: B1678, Kalamazoo County

Dear Thomas Olstad:

VIOLATION NOTICE

On December 14, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation of Graphic Packaging (facility) located at 1500 North Pitcher Street, Kalamazoo, Michigan. The purpose of this investigation 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 Renewable Operating Permit (ROP) number MI-ROP-B1678-2015; the conditions of Permit to Install (PTI) number 133-19A; and to investigate a recent complaint which we received on December 14, 2022, regarding foul odors attributed to facility operations.

During the investigation, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|--|--|
| Mill Operations | R 336.1901 (Rule 901), General Condition 12(b), Section 1, of MI-ROP-B1678-2015, and General Condition 6 of PTI #133-19A | Strong and persistent odors were detected off-site |

In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451 (and General Condition 6 of PTI number 133-19A and General Condition 12(b), Section 1 of MI-ROP-B1678-2015).

The AQD staff detected odors in the Northside neighborhood of Kalamazoo on Krom Street between Hopkins and Herbert Streets and on Burdick Street, Union Street, and Rose Street between Dunkley and Hopkins Streets.

Thomas Olstad
Graphic Packaging International, LLC
Page 2
December 19, 2022

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 9, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should 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.

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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Monica Brothers

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

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