



Frequently Asked Questions

Graphic Packaging International
Kalamazoo County, Michigan

The Michigan Department of Environment, Great Lakes and Energy (EGLE) Air Quality Division (AQD) provides the following answers to frequently asked questions related to Graphic Packaging International, LLC, (Graphic Packaging) located at 1500 North Pitcher Street in Kalamazoo, Michigan.

Contents

- What does Graphic Packaging do? 2
- What existing processes have air permits? 2
- Is the facility proposing any process changes? 2
- What is Graphic Packaging proposing to install? 2
- What is a Permit to Install (PTI) and why is one needed? 2
- Why does the AQD review potential emissions? 2
- Will the emissions from the proposed project affect public health in the area? 3
- How does the AQD evaluate comments received on a proposed permit? 3
- What happens after the close of the comment period? 3
- Will these changes, if approved, emit hydrogen sulfide? 3
- How often is this facility inspected by EGLE’s AQD? 3
- What about the odors associated with this facility? 4
- How are odor complaints addressed by EGLE? 4
- Has Graphic Packaging ever been cited for odors? 4
- What is the current air quality in the area? 4
- What other resources can help me with my environmental questions? 5
- Where can I find more information on Graphic Packaging? 5
- Who should citizens contact with questions and/or complaints about Graphic Packaging? 5
- What other ways can the community get involved with air quality? 5

What does Graphic Packaging do?

Graphic Packaging produces paper-based packaging for a variety of products including cups, cartons, boxes, and other food containers. The company produces paper material as well as folds and labels the products.

What existing processes have air permits?

Graphic Packaging has most of its current processes contained in an air permit called a Renewable Operating Permit or ROP, [No. MI-ROP-B1678-2015](#). These processes include paperboard machines, paperboard coating machines, fuel burning equipment and cleaning equipment. This type of permit is reviewed and goes through a renewal process, which includes a public comment period, every five years.

Additionally, Graphic Packaging was recently issued an air permit, [No. 133-19](#), for an additional paperboard line, which has not yet been incorporated into their ROP.

Is the facility proposing any process changes?

Yes. Graphic Packaging has applied to make some changes to permit [No. 133-19](#). This change request is application No. 133-19A which the AQD recently completed its review. The proposed permit will be open for public comment from September 10, 2020 through October 23, 2020. A virtual public hearing will be held on the proposed permit on October 15, 2020. Information related to the public comment period and the public hearing is posted on [AQD's public notice page](#).

What is Graphic Packaging proposing to install?

Graphic Packaging is proposing to modify the project previously permitted on March 5, 2020. The permit application proposes to change the original project as follows:

- Replace the single larger boiler (370 MMBtu/hr) with two smaller natural gas boilers (311 MMBtu/hr each)
- Lower the annual natural gas limit for Boiler #8
- Addition of two new natural gas-fired precoat calendar heaters
- Modification of the maximum heat input ratings for the natural gas-fired dryers
- Removal of the previously proposed diesel-fired emergency fire pump
- Removal of the previously proposed starch cooker
- Modification of the water flow rating of the utility cooling tower
- Modification of the stack designs for the new boilers, paper machine, and add utility cooling tower
- Modification of the emission limits for the paperboard machine
- Update the permit conditions for Boiler #9 which is only capable of burning natural gas

What is a Permit to Install (PTI) and why is one needed?

A PTI, commonly known as an air use permit, is required for projects that involve installing, constructing, reconstructing, relocating, or modifying most processes or process equipment that emit, or may emit, air contaminants, such as the new equipment that Graphic Packaging is proposing to install under PTI Application No. 133-19A.

Why does the AQD review potential emissions?

The AQD evaluates the potential emissions of a process during the review, not the actual emissions. This means the worst-case scenario with the highest possible emissions are evaluated. The potential emissions are typically much higher than what would be emitted during normal operations. The United States Environmental Protection Agency (USEPA) and EGLE set the standards the facility needs to meet. In the case of the proposed permit, No. 133-19A, air dispersion modeling was used to determine whether the potential emissions would meet the standards. Air dispersion modeling is a computer program which considers potential emissions, weather, terrain, and other factors to see where emissions may go. Air dispersion modeling indicated that the potential emissions would meet the standards.

The proposed permit, No. 133-19A, if approved, would require Graphics Packaging to test their emissions to verify actual emissions are below permitted limits.

Will the emissions from the proposed project affect public health in the area?

The USEPA has developed health-protective standards for specific air pollutants. These standards are called the National Ambient Air Quality Standards (NAAQS). NAAQS are developed from research studies and are set at levels to protect public health. This includes health protection for sensitive groups like those with heart and lung problems. For pollutants not subject to NAAQS, EGLE AQD also develops air toxics screening levels that provide public health protection. The potential emissions from the project were reviewed and determined to comply with these rules and regulations, designed to protect public health.

How does the AQD evaluate comments received on a proposed permit?

Every comment is reviewed to determine if further technical review is warranted. If a technical review is warranted, it will be described in the Response to Comment document developed in combination with the final action on the application. The final action can be approval as proposed, approval of the proposed conditions with changes, or denial of the application.

What happens after the close of the comment period?

The AQD will evaluate and consider all comments made by the end of the comment period and take a final action as previously discussed. If the final action is to approve the proposed permit, Graphic Packaging may start construction of the proposed equipment upon this final approval. If the final action is to deny the permit, Graphic Packaging may address the issues resulting in the denial and submit a new PTI application later. However, they are still allowed to continue to install and operate the original equipment permitted under [PTI No. 133-19](#).

Will these changes, if approved, emit hydrogen sulfide?

No. The requested changes are primarily related to the boilers for the new paperboard coating line. More information on these proposed changes is discussed above and posted on AQDs public notice page.

How often is this facility inspected by EGLE's AQD?

Graphic Packaging is inspected at least every other year for compliance with state and federal regulations, as well as their Renewable Operating Permit (ROP). Additionally, if complaints are received, some portions of the facility may be inspected more frequently as part of a complaint investigation.

What about the odors associated with this facility?

[PTI No. 133-19](#) requires the company to develop and implement an [Odor Investigation Plan](#). This odor investigation started on July 9, 2020 and is scheduled to continue until September 8, 2020. The odor investigation includes perimeter and community monitoring conducted three times a week. The company is also installing a monitoring platform which will collect data from 10 hydrogen sulfide monitors and one weather station which is expected to be in operation by the end of 2020. [PTI No. 133-19](#) also requires the submittal of a Nuisance Minimization Plan for Odors within 60 days of submitting the results of the odor investigation.

How are odor complaints address by EGLE?

When odor complaints are received, staff respond by conducting an odor evaluation. An odor evaluation uses a prescribed method to determine whether an odor would be considered objectionable. AQD staff follow a procedure considering intensity, duration, and frequency of the odors to determine whether the odors are objectionable to constitute a violation of Rule 901. Rule 901 prohibits the emission of an air contaminant in quantities that cause (a) injurious effects to human health or safety, animal life, plant life of a significant economic value, or property; or (b) unreasonable interference with the comfortable enjoyment of life and property.

The intensity of an odor is rated by the inspector on a 0-5 scale, with 5 being an odor so strong as to be overpowering and intolerable for any length of time and 0 being non-detect. This intensity scale combined with the length of time the odors are present, as well as the frequency of the odor will be considered when determining whether Rule 901 has been violated.

If odors are deemed objectionable by the above procedure, a Violation Notice will be sent to the facility asking them to respond to the AQD with a plan on how they will correct the odor issue going forward.

Has Graphic Packaging ever been cited for odors?

Yes. EGLE has issued eight violation notices to Graphic Packaging since 2012 for odor violations. EGLE also has received over 100 complaints against Graphic Packaging since 2010. Of these, 89 were for odors and 13 for fallout. These complaints were evaluated using the AQD method described above.

What is the current air quality in the area?

The USEPA has developed health-protective standards for specific air pollutants referred to as the NAAQS. There are NAAQS for sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter equal to or less than 10 microns in diameter (PM₁₀), particulate matter equal to or less than 2.5 microns in diameter (PM_{2.5}), ozone, and lead.

NAAQS are developed from research studies and are set at levels to protect public health. This includes health protection for sensitive groups like those with heart and lung problems.

The AQD has one air monitoring site in Kalamazoo County. Based on monitoring, the county is meeting all NAAQS. EGLE's [MIAir website](#) contains near real time air monitoring information.

What other resources can help me with my environmental questions?

Another tool which may be useful, is [EJ Screen](#), an Environmental Justice Screening and Mapping Tool created and maintained by the USEPA. This tool provides a nationally consistent dataset and approach for combining environmental and demographic indicators for those interested.


Where can I find more information on Graphic Packaging?

EGLE's web page, [Michigan.gov/EGLEGraphicPackaging](https://www.michigan.gov/EGLEGraphicPackaging), contains information about the facility, such as compliance information, the Odor Investigation Plan, and air emissions information. More information will be added to this page as it becomes available.

Who should citizens contact with questions and/or complaints about Graphic Packaging?

Citizen complaints should be directed to Monica Brothers of EGLE AQD in the Kalamazoo District Office, at 269-312-2535 or at BrothersM@Michigan.gov during normal business hours. After hours complaints should be submitted to the Pollution Emergency Alerting System Hotline at 800-292-4706. It is recommended you contact the AQD as soon as you observe a problem, which allows staff to investigate the situation while it is still on-going,

What other ways can the community get involved with air quality?

Anyone in the community can sign-up to get Air Quality updates by signing up for our e-mail listserv. Go to [Michigan.gov/Air](https://www.michigan.gov/Air), click on the red envelop in the bottom left hand corner. 

You can also subscribe to our [EGLE events calendar](#) or check out [Michigan.gov/EGLEEvents](https://www.michigan.gov/EGLEEvents) to see upcoming events and meetings.

Michigan's Environmental Justice Policy promotes the fair, non-discriminatory treatment and meaningful involvement of Michigan's residents regarding the development, implementation, and enforcement of environmental laws, regulations, and policies by this state. Fair, non-discriminatory treatment intends that no group of people, including racial, ethnic, or low-income populations, will bear a disproportionately greater burden resulting from environmental laws, regulations, policies, and decision-making.

Meaningful involvement of residents ensures an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations.