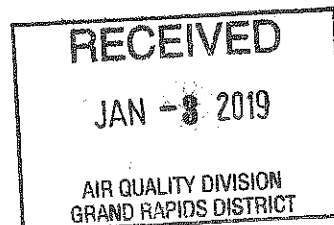


Manilla

December 26th, 2018



Mr. David Morgan
Department of Environmental Quality
Air Quality Design
350 Ottawa Avenue NW Unit 10
Grand Rapids, Michigan 49503



Dear Mr. Morgan:

I am responding to the Violation Notice issued on December 12, 2018 to Sheridan Publishing Grand Rapids. The violation was issued to Sheridan based on findings from your visit on December 4th, 2018.

The reason for the violations stated in the letter were all related to our records not being up to date for 2018. We do not contest any of these violations as they are correct.

The reason for the violations/records not being up to date are related to company restructuring and position eliminations. Within the last few years there have been multiple position terminations and restructuring that caused the record keeping on this to be overlooked. At this time the violations are still ongoing as we are working on getting our records up to date and current.

We are working with Environmental Partners, Inc. to help get our records up to date. Following are the current actions we will be taking with their assistance.

- 1) Create a baseline recordkeeping spreadsheet for CY 2018 that is ready for data entry (Utilize current if applicable).
- 2) Update materials specifications in the spreadsheet for new materials used in 2018.
- 3) Enter monthly materials usage data into the recordkeeping spreadsheet for each month in 2018.
- 4) Create the CY 2018 MAERS annual emission report for submittal to the DEQ by Sheridan Pub.

Our plan to correct these violations and steps to prevent reoccurrence are:

- 1) Have all materials updated and records up to date by February 28th, 2019 or sooner to be able to submit our CY 2018 Tier II Hazardous Inventory report.
- 2) Designate process owner of new standard work to maintain records and continue relationship with Environmental Partners, Inc.
- 3) Put into place a process that will not let this record keeping fall through the cracks if there is any further restructuring moving forward.

Sincerely,

Jason Nelson
Director of Operations
Sheridan Publishing Grand Rapids