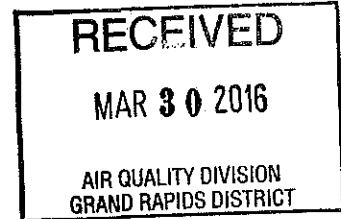


Plant



STEVEN C. KOHL
PARTNER
248.784.5141
FAX 248.603.9741
skoht@wnj.com

March 29, 2016



Via Email

Ms. April Lazzaro
Michigan Department of Environmental Quality
Air Quality Division -- Grand Rapids District
350 Ottawa Avenue, NW, Unit 10
Grand Rapid, Michigan 49503-2341

Re: Grandville Printing Company -- Notice of Violation

Dear Ms. Lazzaro:

Grandville Printing Company (GPCO) has requested Warner Norcross & Judd's assistance in responding to the Violation Notice you issued to GPCO on February 23, 2016. In developing this response, we have been assisted by GPCO and its consultant, Air & Water Compliance Group LLC. We hope that the level of resources GPCO has dedicated in responding to you and in otherwise addressing the issues you have raised demonstrates GPCO's recognition of the seriousness of the matter and a full intent to resolve all issues appropriately. As the violation notice separately cites to violations of Rule 210 and Rule 201, we will respond, to each separately.

Rule 210 Violation

We understand, based upon the inspection reports and other available correspondence that, in the AQD Grand Rapids District's current judgment, the facility as presently configured has a potential to emit (PTE) for VOC's of greater than 100 tons on a 12-month rolling basis and, therefore, should be considered a "major source" within the meaning of the AQD's Part 2 rules and the federal Clean Air Act. As a putative "major source" the facility should have applied for a renewable operating permit under Rule 210 and the failure of the facility to have obtained an ROP is a violation of applicable rules. With all due respect, GPCO disagrees with the assessment that it is a "major source" as an appropriate assessment of the facility's PTE reveals that it should be considered a "minor source". The District's assessment is predicated upon GPCO processes being capable of operating continuously 8760 hours per year. This is not the case.

The AQD's rules, MAC R 336.1101, define PTE as:

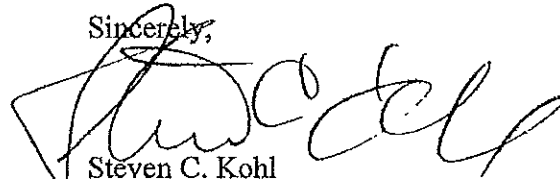
290 exemption. As a consequence, GPCO cannot identify a basis for the asserted Rule 201 violation.

Conclusion

Notwithstanding that GPCO believes it is a true minor source for air contaminants and that is in compliance with the AQD Part 2 exemption requirements, GPCO desires to insulate itself from further controversy with the AQD regarding its permitting status. To this end, and as the District is aware, GPCO has submitted a PTI application for the purpose of obtaining permit recognition that the PTE of the web press department is limited by the RTO interlock system which is employed at the facility and to otherwise recognize the facility as a synthetic minor source. GPCO believes that issuance of this PTI should fully resolve any of the issues raised.

If you have any questions or require any information not already provided to the District or the AQD Permit Section, please do not hesitate to contact me. However, you should be aware that I will be out of my office from March 31 until April 11, 2016. .

Sincerely,



Steven C. Kohl
Partner

Attachment

Cc/Via Email: Ms. Lynn Fielder
Ms. Teresa Siedel
Ms. Prudy Blue
Ms. Heidi Hollenbach
Mr. Thomas Hess
Grandville Printing

SCK/sck