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OCT 24 2016

AIR QUALITY DIVISION
GRAND RAPIDS DISTRICT

Mr. Dave Morgan
State of Michigan
Department of Environmental Quality
Grand Rapids District Office

October 21, 2016

Re: Violation Notice response

Dear Sir,

In response to the violation notice dated October 5, 2016, Creative Merchandising Systems acknowledges the record keeping violation and has taken steps (detailed below) to correct the situation. We regret the failure on our part and assure you and the DEQ that in was unintended.

You have received via email a summary of our usage for the 12-month period prior to your inspection of September 21, 2016. Since that date, we resumed collecting usage data weekly at each booth and are entering it into a database as well as archiving those hardcopies submitted by the operators. We now have a system in place that will not only collect the data but can produce reports of any time period desired. It is our intention to continue this data collection process.

In the past Mr. Kocharoff did establish record keeping but with his departure from the company the task fell away. The last usage records I could find were from 2011. The gap in data continued until after your visit on September 21, 2016. Mr. Korharoff's replacement was apparently unaware of the requirement, as was I. That requirement has been added to the "Description and Responsibilities" of the plant manager position as well as to the department supervisor's.

I invite you to return at your leisure to review the steps and forms we now have in place.

Sincerely,



Mark Stancliff
Plant Manager

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