



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

March 22, 2018

Mr. Brian Anderson
Michigan Foam Products LLC
1820 Chicago Drive SW
Grand Rapids, Michigan 49519

SRN: N3078, Kent County

Dear Mr. Anderson:

VIOLATION NOTICE

On February 26, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Michigan Foam Products LLC located at 1820 Chicago Drive SW, Grand Rapids, Michigan. The purpose of this inspection was to determine Michigan Foam Products LLC'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; and the conditions of Permit to Install (PTI) number 211-02B.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPLASTICRESIN	PTI No. 211-02B Special Condition (SC) 1.1	Exceedance of VOC emission limit
EUPLASTICRESIN	PTI No. 211-02B, SC 1.4	Sampling not completed per approved sampling plan
EUPLASTICRESIN	PTI No. 211-02B, SC 1.5	Incomplete records

At the time of the inspection, the records for EUPLASTICRESIN were incomplete, only updated through May 2017. Records through January 2018 were later provided after the inspection.

As of January 2017, Michigan Foam Products LLC exceeded their 12-month rolling total volatile organic compound (VOC) emission limit of 64 tons per year. The highest exceedance at 77.95 tons occurred in January 2018.

Michigan Foam Products LLC was late in testing the VOC content of the expanded polystyrene (EPS) beads for the 2017 reporting year, per the submitted sampling plan by the facility.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 12, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

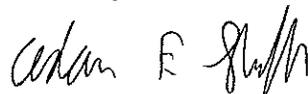
Please include in the response the following:

- Per Rule 278a, documentation supporting the applicability of the Rule 285(2)(b) air permit exemption for the installation of the additional hot wire cutting machine and the replacement of equipment for the mold area.

If Michigan Foam Products 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 violations cited above and for the cooperation that was extended to me during my inspection of Michigan Foam Products LLC. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Shaffer
Environmental Quality Analyst
Air Quality Division
616-356-0767

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ