



STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

GRETCHEN WHITMER  
GOVERNOR

August 13, 2020

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 June 29 and July 9, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received requested emission and pentane testing records from Michigan Foam Products, LLC, located at 1820 Chicago Drive SW, Grand Rapids, Michigan. The purpose of this records request 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 211-02D.

During the review of the records provided, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPLASTICRESIN	PTI No. 211-02D, EUPLASTICRESIN, Special Condition (SC) I.2	Exceeded 8-hour VOC emission limit
EUPLASTICRESIN	PTI No. 211-02D, EUPLASTICRESIN, SC V.1	Not following the AQD approved sampling schedule

It was brought to the AQD's attention by Michigan Foam Products, LLC, that their 8-hour volatile organic compound (VOC) emission limit had been exceeded. A subsequent request and review of records from April 2020 through June 2020 identified four times that the 8-hour VOC emission limit was exceeded. This is a violation of PTI No. 211-02D, EUPLASTICRESIN, SC I.2.

The 2019-2020 pentane sampling results were requested to review and verify compliance. Upon review of the test results, it was determined that Michigan Foam Products, LLC had mistakenly selected the most used bead types from 2020 instead of 2019 to determine the production-weighted average VOC content of product from EUPLASTICRESIN for the year 2019. Additionally, the samples for 2020 were submitted late to be tested. Based on the information provided, Michigan Foam Products, LLC did not follow their sampling plan dated November 16, 2016 for the year 2020 and this is a violation of PTI No. 211-02D, EUPLASTICRESIN, SC V.1.

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When providing the VOC emission records identifying the emission exceedances, Michigan Foam Products, LLC included a response to the violation. The response to the VOC 8-hour emission exceedances appears acceptable, but a response to the sampling schedule violation is required. Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 3, 2020 (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 submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapid, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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 our phone conversation and subsequent records request. 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  
616-970-9077

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE