

Ms. Kaitlyn DeVries
Environmental Quality Analyst
Air Quality Division
Department of Environmental Quality
Grand Rapids District Office
State Office Building
350 Ottawa Avenue, NW
Unit 10
Grand Rapids, MI 49503-2341



January 16, 2017

Regarding: Violation Notice December 27, 2017
Comfort Research, 1719 Elizabeth Avenue, NW, SRN: N1916 Kent County

Dear Ms. DeVries,

Comfort Research is in receipt of the above referenced violation notice (VN). In response, Corrective Action Plan (CAP) 2017-001 was created to mitigate the fallout observed on November 17, 2016.

CAP 2017-001 states the root causes are as follows:

- Current bead process results in a large number of small pieces mixed with the larger beads.
- Filters in Hirsch steam stack are not efficiently catching and filtering out the small pieces after the expansion process.
- PM's are not being performed on Hirsch.

The following permanent corrective actions are being evaluated and verified:

- Get a larger shipments of low dust beads to confirm density studies.
- Get data from RAPAC on reduction of dust with low dust beads.
- Evaluate other filter sizes for fluidized dryer bed filters.
- Evaluate cyclone in steam stack to catch dust.
- Investigate Hirsch PM's.

See the attached document for the target dates.

Once permanent corrective actions are implemented and validated, we will maintain PM processes to prevent recurrence of the issue.

If you have any questions regarding this response, please contact me at 616-475-5000.

Sincerely,



Kathleen Cabrera
Quality Engineer

cc via e-mail: Mike Kitchen, Comfort Research
Joel Burkel, Comfort Research