



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 2, 2022

Michael Kitchen
Comfort Research
1719 Elizabeth Avenue NW
Grand Rapids, Michigan 49504

SRN: N1916, Kent County

Dear Michael Kitchen:

VIOLATION NOTICE

On July 14, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Comfort Research located at 1719 Elizabeth Avenue NW, Grand Rapids, Michigan. The purpose of this inspection was to determine Comfort Research'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 84-19.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGEXPANDONLY	PTI number 84-19, Special Conditions VI.1. – VI.5.	Failure to update and maintain required records.
FGFUSION	PTI number 84-19, Special Conditions VI.1. – VI.5.	Failure to update and maintain required records.
FGFACILITY	PTI number 84-19, Special Conditions VI.1. – VI.2. (a-d)	Failure to update and maintain required records.

During this inspection and in subsequent requests, Comfort Research was unable to produce any required records.

This is a violation of the recordkeeping requirements specified in Special Conditions VI.1. - VI.5. of FGEXPANDONLY contained in PTI number 84-19. This is also a violation of the recordkeeping requirements specified in Special Conditions VI.1.- VI.5. of FGFUSION, as well as Special Conditions VI.1. and VI.2. (a-d) of FGFACILITY, contained in PTI number 84-19.

The conditions of PTI number 84-19 require the permittee to: complete calculations by the last day of the calendar month for the previous month; record the throughput of EPS beads through the FGEXPANDONLY and FGFUSION first stage expansion in pounds on a calendar day basis; record 12-month rolling time period throughput of EPS beads through FGEXPANDONLY and FGFUSION first stage expansion; record pounds of volatile organic compound (VOC) per 100 pounds of EPS beads for each shipment of EPS beads received; calculate 12-month rolling time period VOC emissions from FGEXPANDONLY and FGFUSION; record pounds of EPS beads

Michael Kitchen
Comfort Research
Page 2
August 2, 2022

processed per month and per 12-month rolling time period; record VOC content in pounds per 100 pounds of EPS beads processed for each lot of beads; and maintain VOC emission calculations determining monthly emission rate in tons per calendar month as well as tons per 12-month rolling time period. In accordance with the permit, these records shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice and provide the referenced records above for the time period of January 1, 2021, through June 30, 2022, by August 23, 2022 (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 Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Comfort Research 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 Comfort Research. 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,



Michael Cox
Environmental Quality Analyst
Air Quality Division
616-240-3607

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE