



April 3, 2018

Michigan Department of Environmental Quality  
Air Quality Division  
350 Ottawa Ave NW # 10,  
Grand Rapids, Michigan 49503

Attn.: Adam Shaffer, Environmental Quality Specialist

Re: SRN N3078: Michigan Foam Products, LLC.  
1820 Chicago Drive SW,  
Grand Rapids, Michigan  
Violation Notice dated March 22, 2018

Dear Mr. Shaffer:

This letter is submitted in response to the Michigan Department of Environmental Quality (MDEQ) violation notice dated March 22, 2017 issued to Michigan Foam Products, LLC. Below are the cited violations, as they appear in the violation notice, and our planned action of remediation for each cited violation:

**EUPLASTIC RESIN: PTI No. 211-02B Special Condition (SC) 1.1**  
***Exceedance of VOC emission limit***

The facility has experienced higher production rates over the last several months leading to the corresponding increase in monthly emissions. Although it is difficult to predict future production trends, the company has decided to apply for a permit to install with increased annual emission limits that will allow the facility to meet the current higher production demands. Additionally, the facility will monitor its monthly emission levels very closely going forward in order to avoid exceedances of permit limits.

At this time, Michigan Foam Products, LLC. has retained the services of AEM Group of Plymouth, Michigan to assist our company with the preparation of a permit to install application in order to accommodate the increased production levels, and associated emissions. Based on our conversation with AEM Group, Michigan Foam Products, LLC. plans to file the air permit application by May 18, 2018.

**EUPLASTIC RESIN: PTI No. 211-02B SC 1.4**  
***Sampling not completed per approved sampling plan***

Based on an assessment of our internal systems, we feel that this was an oversight on our part, wherein we failed to contact the laboratory that performs analytical testing on our foam samples.

The facility has now put the sampling plan schedule on our calendars, as a reminder, and also plans to inform the laboratory performing the analysis regarding the schedule that is required to comply with the sampling plan.

**EUPLASTIC RESIN: PTI No. 211-02B SC 1.5**

***Incomplete records***

The facility has been maintaining records per the permit requirements following the MDEQ inspection.

**Rule 336.1201 exemption for additional hot wire cutting machine, and replacement of equipment in the mold area**

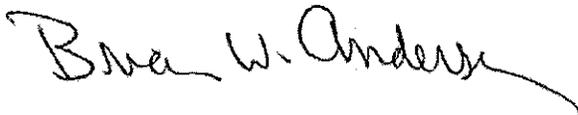
It was our understanding that the addition of the hot wire cutting machine, and the replacement of equipment in the mold area qualifies for exemption under Rule 285 subpart (2) (b):

Changes in a process or process equipment which do not involve installing, constructing, or reconstructing an emission unit and which do not involve any meaningful change in the quality and nature or any meaningful increase in the quantity of the emission of an air contaminant therefrom.

Michigan Foam Products, Inc. is of the opinion the emissions resulting from the aforementioned changes, are already accounted for in the overall emission resulting from the foam production. Therefore, there is no net change in emissions, as a result of these changes.

Should you have any questions, please call me at 616-452-9611. For any technical questions, please contact Mr. Biplab Roy, Senior Project Manager of AEM Group at 734-635-0066.

Sincerely,

A handwritten signature in black ink that reads "Brian W. Anderson". The signature is written in a cursive style with a long horizontal line extending to the right.

Brian Anderson  
Plant Manager