



**Michigan Foam Products 1820 Chicago Drive, Grand Rapids, MI 49519**

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May 12, 2020

Michigan Department of Environment, Great Lakes, and Energy (EGLE)  
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 April 30, 2020

Dear Mr. Shaffer:

This letter is submitted in response to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) violation notice dated April 30, 2020 issued to Michigan Foam Products, LLC. Below is the cited violation, as it appears in the violation notice, and our planned action of remediation for the cited violation:

**PTI No. 211-02D, EUPLASTICRESIN, Special Condition (SC) I.2**  
***Exceeded 8-hour VOC emission limit***

Michigan Foam Products, Inc. has observed that the 8-hour emissions limit exceedances occurred in the first and second shifts of operation. It was concluded that the exceedances resulted from operating equipment and processes that cause most of the pentane emissions during those two shifts. The facility has since been able to run the production schedule in a manner that 1<sup>st</sup> and 2<sup>nd</sup> shift operations complete a portion of the scheduled work within the 3<sup>rd</sup> operating period.

The facility has not exceeded the 8-hour limit since March 2020, after it has adopted the new production schedule. However, the facility also feels that production levels have been low over the last two months due to the COVID-19 pandemic, and the facility may have issues meeting the short-term limit once production levels reach normal levels.

Based on the above, the facility plans to utilize the services of our environmental consulting firm to perform a refined dispersion modeling study by utilizing AERMOD, and evaluate the potential of getting a higher 8-hr emission limit based on the study.

Michigan Foam will have the results of the dispersion modeling study from our consulting firm by June 30, 2020. If the results support the increase in the short-term emission limit, the facility will present the results to EGLE requesting an increase in the 8-hour emission limit.

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 fluid and cursive, with a long horizontal flourish extending to the right.

Brian W. Anderson  
General Manager

Phone- 1-616-452-9611, Fax- 1-616-452-0533, e-mail- [banderson@michiganfoam.com](mailto:banderson@michiganfoam.com)

[www.michiganfoam.com](http://www.michiganfoam.com)