



April 18, 2023

Mr. Michael Cox
Environmental Quality Analyst
MI EGLE Air Quality Division
Grand Rapids District
350 Ottawa Ave. NW, Unit 10
Grand Rapids, MI 49509

re: Violation Notice of March 31, 2022 for Harbor Foam (SRN: N7754)

Dear Mr. Cox:

This letter is in response to the Violation Notice of March 31, 2023 regarding an exceedance of the Volatile Organic Compounds (VOC) limit in our ROP (MI-ROP-N7754-2018) and our Permit-to-Install (PTI No. 35-07C).

Harbor Foam has been experiencing increased orders since early in 2021 as a result of "catching up" from the COVID pandemic. As a result, we applied for a temporary increase in VOC emissions (PTI 35-07C) in order to operate within permit limits during this period.

PTI No. 35-07C allowed for increased emissions beginning in September 2021 and extending through June 2022. The exceedances occurred in July 2022 and August 2022 which are the first and second months after the temporary VOC emissions increase expired. We became aware of the exceedance in mid-August 2022 after the July 2022 emissions records had been produced. Upon realizing that VOC emissions were exceeding the limit, we took immediate action to reduce 12-month rolling VOC emissions. This included:

- ♦ Harbor Foam rescheduled orders that would have been produced in August and September to later months.
- ♦ Harbor Foam informed customers that some orders could not be filled due to not being able to increase production without continuing to exceed the VOC limit.

Unfortunately, these actions did not result in August emissions being below the limit. However, 12-month rolling VOC emissions were within the limit for the month the September and every month since. As our emission limit is now fixed, we are in a much



better position to schedule production to meet customer orders while continuing to meet the VOC emissions limit.

Note that we have been in the process for the last two years of amending our current permit due to a large expansion of our facility. This expansion will include the installation of an additional pre-expander and shape mold and will include the installation of an RTO to control emissions from the existing and new pre-expanders and the pre-puff aging area.

Unfortunately, due to equipment delays caused by a shortage of electrical equipment and computer chips, the delivery of the RTO has been delayed. If the delivery of the equipment had been timelier, the need to turn away customer orders may not have been necessary.

We hope that these explanations are satisfactory but please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Kuperus', with a long horizontal flourish extending to the right.

Laura Kuperus
Vice President

cc: Jenine Camilleri, Enforcement Unit Supervisor