



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

March 31, 2023

Laura Kuperus
Harbor Foam
2950 Prairie Street SW, Suite 300
Grandville, Michigan 49418

SRN: N7754, Kent County

Dear Laura Kuperus:

VIOLATION NOTICE

On March 9, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Harbor Foam located at 2950 Prairie Street SW, Suite 300, Grandville, Michigan. The purpose of this inspection was to determine Harbor Foam'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 35-07C as well as the conditions of Renewable Operating Permit (ROP) number MI-ROP-N7754-2018.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPLASTICRESIN	MI-ROP-N7754-2018, EUPLASTICRESIN, Special Condition I.1.	Exceeded 139.8 tons per year Volatile Organic Compounds (VOC) limit.
EUPLASTICRESIN	PTI No. 35-07C, EUPLASTICRESIN, Special Condition I.7.	Exceeded 139.8 tons per year Volatile Organic Compounds (VOC) limit.

Records provided by Harbor Foam indicate that the facility exceeded the VOC emission limit of 139.8 tons per year as stated in MI-ROP-N7754-2018, Special Condition I.1. and PTI No. 35-07C, Special Condition I.7. during the 12-consecutive month periods ending in July 2022 and August 2022 when 148.16 tons and 142.14 tons of VOC were emitted, respectively.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 21, 2023 (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

Laura Kuperus
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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. It is noted that the emission limit violations were reported as deviations by the company in their ROP Semi-annual and Annual Certification Reports.

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 Harbor Foam 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 Harbor Foam. 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 T. Cox

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

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