

November 12, 2013

Denise Plafcan
Senior Environmental Quality Analyst
Air Quality Division
State Office Building
350 Ottawa Avenue, NW
Unit 10
Grand Rapids, MI 49503-2341



**Re: *Comfort Research, Inc. Response to Violation
Notice Dated October 29, 2013***

Dear Ms. Plafcan:

On November 1, 2013 Comfort Research, Inc. ("Comfort Research") forwarded electronic copies of data identified in the violation notice. This letter supplements Comfort Research's response provided electronically to the MDEQ-AQD Grand Rapids District Office on November 1, 2013.

1. Records of EPS Bead Throughput

The first item discussed in the October 29, 2013 Violation Notice concerns records of EPS bead throughput. EPS raw bead throughput is recorded each day and summarized in spreadsheet form. As described above, a copy of the missing record was forward electronically upon receipt of the VN notification. Please note the daily information is summarized and tabulated on the specific monthly data sheet (for example August, 2013) and a separate data sheet tallies the individual monthly data and is summarized on the sheet labeled; *EPS Processing Emissions Summary*. This sheet was also forwarded on November 1. A copy of both reporting sheets will be forwarded to your office within 30 days of the end of the calendar month, in accordance with the Consent Order requirements.

2. Records of the Pounds of VOC per 100 Pounds of EPS Beads

Each monthly sheet includes the pounds of VOC per 100 pounds of EPS bead. This appears at the top of the monthly summary sheet in the row that is labeled; *Raw Bead Pentane Content*. The value is expressed as a percentage (%) by weight as listed on the MSDS from the supplier. By definition, pentane is a VOC and the unit of percentage by weight recorded from MSDS is equivalent to pounds per 100 pounds. Therefore Comfort Research believes the unit of reporting is accurate to the requirement outlined in the Consent Order at Paragraph 15.

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Air permit number 150-12A was based on emissions quantifications from the pentane content tabulated as formulation content of pentane for the EPS bead listed on the supplier data. The emissions are reported based on the assumption that all pentane used to make the raw bead is lost at Comfort Research upon first pass expansion in the Hirsch unit. For several reasons this method of quantifying emissions over states the pentane (and hence VOC emissions) that are tabulated and summarized as monthly emissions. Regardless, the pentane (VOC) content of the bead processed in a given month is reflected on the monthly summary sheets forwarded to the AQD. Additional copies for July, August and September 2013 (Monthly) and the (annual) emissions summary sheets through September are attached to this response. We acknowledge both the monthly sheet and the annual summary sheet must be submitted each month to comply with the Consent Order provisions and copies will be forwarded to the District Supervisor each month in accordance with the CO provisions.

3. 12-Month Rolling Time Period Records

As stated in response #2 above, the individual monthly data is aggregated on to the EPS Processing Emissions Summary Sheet and additional copies are attached to this response. The Processing Emissions Summary sheet includes columns which tabulate the 12-month rolling calculation for both the total mass of EPS bead utilized/processed and the 12-month rolling sum of the VOC emissions assuming 100% of the formulated pentane is lost at the Hirsh unit during the first pass EPS expansion step. We acknowledge both the monthly sheet and the annual summary sheet must be submitted each month to comply with the Consent Order provisions and copies will be forwarded to the District Supervisor each month in accordance with the CO provisions.

Thank you for your attention to this matter. Please let me know if you have any further questions regarding these matters.

Sincerely,

Comfort Research, Inc.



Robert Crow

Attachments: (5 Sheets)

C: Robert Crow, Comfort Research
Heidi Hollenbach, DEQ
Lynn Fielder, DEQ
Teresa Seidel, DEQ
Thomas Hess, DEQ
Matt Jung, Comfort Research
Jeff Pfof, Environmental Partners, Inc.
S. Lee Johnson, Esq.

Plafcan, Denise (DEQ)

From: Rob Crow <rcrow@comfortresearch.com>
Sent: Thursday, October 31, 2013 5:31 PM
To: Plafcan, Denise (DEQ)
Subject: Comfort Research Information
Attachments: doc02315720131031164515[1].pdf

Denise:

Please find attached the emissions summary sheet. This sheet is included in our record keeping, in reading the consent order language we realized that we need to be sending you this also every month. We will make sure that all future submittals will include the monthly data and the yearly summary sheet.

Also note that each month our daily consumption data and monthly emissions are tabulated using the pentane content for the raw bead as received from our supplier.

An MSDS for this material is on file and we can send you a copy if you do not already have one on file.

We believe this information satisfies the noted deficiencies and we greatly apologize for the oversight. If you have any questions please contact me.

A written formal response along with the data for October will be coming to you shortly.

I also faxed a copy of both this letter and the data sheet.

Sincerely,
Rob Crow