



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT  
DIRECTOR

October 29, 2013

**CERTIFIED LETTER – 7010 1670 0000 3757 8677**  
Return Receipt Requested

Mr. Matt Jung, Owner  
Comfort Research, Inc.  
1719 Elizabeth Avenue NW  
Grand Rapids, Michigan 49504

SRN: N1916, Kent County

Dear Mr. Jung:

**VIOLATION NOTICE**

The Department of Environmental Quality (DEQ), Air Quality Division (AQD), has reviewed the July 2013 and August 2013 monthly records submitted by Comfort Research located at 1719 Elizabeth NW, Grand Rapids, Michigan. These records were reviewed to determine 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 administrative rules; the conditions of Permit to Install (PTI) No. 150-12A; and Consent Order AQD No. 4-2013

During this review, staff determined the following:

Process Description	Rule/Permit Condition Violated / Enforceable Consent Order Paragraph	Comments
EUHIRSCH (a polystyrene bead expander)	Consent Order AQD No. 4-2013, Paragraph 14	Records of the EPS bead throughput for the EUBEADEXPAND first stage expanders in pounds per 12-month rolling time period as determined at the end of each calendar month. Records for each calendar month shall be submitted to the District Supervisor within 30 days following the end of the calendar month.
EUHIRSCH (a polystyrene bead expander)	Consent Order AQD No. 4-2013, Paragraph 15	Records of the pounds of VOC per 100 pounds of EPS beads, for each shipment of EPS beads received at the Company. Records for each calendar month shall be submitted to the District Supervisor within 30 days following the end of the calendar month.
EUHIRSCH (a polystyrene bead expander)	Consent Order AQD No. 4-2013, Paragraph 16	12-month rolling time period records of the VOC emission rate from EUBEADEXPAND. Records for each calendar month shall be submitted to the District Supervisor within 30 days following the end of the calendar month.

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Consent Order AQD No. 4-2013 Paragraphs 14, 15 and 16, each state, "Additionally, from the effective date of this Consent Order, the information for each calendar month in which the data was collected and recorded, continuing through January 31, 2014, shall be submitted to the AQD Grand Rapids District Office Supervisor in an approved format within thirty (30) days following the end of the calendar month." As of this date, we have not received all of the required records. On October 4, 2013 an e-mail was sent requesting additional records for July and August to fulfill those requirements. The AQD has not received a response.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 5, 2013 (which coincides with 7 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 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.

If Comfort Research 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. 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,



Denise Plafcan  
Senior Environmental Quality Analyst  
Air Quality Division  
616-356-0259

cc: Mr. Robert Crow, Comfort Research  
Mr. Jeffrey Pfost, EPI  
Ms. Heidi Hollenbach, DEQ  
cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ