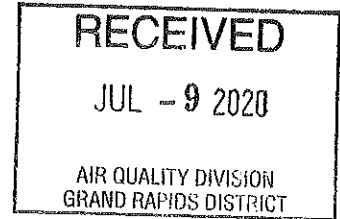




Michigan Foam Products 1820 Chicago Drive, Grand Rapids, MI 49519

Adam Shaffer
Environmental Quality Analyst
EGLE, Air Quality Division
Grand Rapids, District Office



Good day Adam,

Per our conversation this letter is to formalize the data and information surrounding an event we reported to you, that recently caused Michigan Foam Products (MFP) to become out of compliance within (4) of our standard (8) hour measuring periods. The data attached to the email will show the dates, times, and total pounds of VOC's that were emitted. We have also created new documents and procedures that will assist MFP in the tracking and compliance requirements per our permit MI-ROP-N3078-20XX.

EXPLANATION:

In early June we shut down our mold department to do planned maintenance. This maintenance requires us to wash and clean the two major pieces of equipment that make the EPS foam, a prexpander, and mold. We shut down on 6-4-2020 and resumed on 6-8-2020. The first step in the process is our prexpander. This machine ran for a time on Monday 6-8 but experienced an electrical problem the following day 6-9-2020. At that time we determined that an electrical module had gotten wet, and once we restarted it stopped functioning. This small part was now found to be obsolete, and had to be "loaned" to MFP from Hirsch a company based in Austria. The part required a program be loaded into it, and be shipped to Michigan. The issue that caused excessive days of down time, was the package was held for inspection at US customs for FDA review. The part didn't ship to Michigan until the weekend of June 13/14 and landed at our door June 14. The machine was repaired, and back up and running that morning.

Because we lost nearly a full week of production, we had to make up those requirements along with our current production for the coming weeks. Our 'Interval Scheduling Template' is used to calculate total VOC's when scheduling the mold. It is used to show how much material we can expand in an (8) hour period and remain compliant. Because we were pushing the daily limit to catch up, mistakes were made. The first two instances were due to where a material type was switched by the molder on the 6-15 & 16 dates. A missed calculation using the Interval Scheduling Template was the cause for the 6-22 noncompliance.

To stop these types of mistakes from happening in the future, we have added a secondary signoff verifying accuracy of the scheduling template, and the molder must sign off verifying actual material type used versus the scheduled material noted on the Interval Scheduling Template.

Please review the data, and contact myself or Jovan Willis if want to discuss this further.

Regards,

Brian W. Anderson
General Manager
Michigan Foam Products LLC

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