



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

May 16, 2018

Mr. Brian Anderson
Michigan Foam Products LLC
1820 Chicago Drive SW
Grand Rapids, Michigan 49519

SRN: N3078, Kent County

Dear Mr. Anderson:

VIOLATION NOTICE

On February 26, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Michigan Foam Products LLC located at 1820 Chicago Drive SW, Grand Rapids, Michigan. The purpose of this inspection was to determine Michigan Foam Products LLC'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 210-02B.

Upon request for documentation supporting the applicability of the Rule 285(2)(b) air permit exemption for the installation of the additional hot wire cutting machine and the replacement of equipment for the mold area, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Installation of additional hot wire cutting machine and replacement of equipment for the mold area.	Rule 201	Operating without an air use Permit to Install

In a March 22, 2018 Violation Notice sent to Michigan Foam Products LLC, a request was made for documentation supporting the use of the Rule 285(2)(b) air permit exemption for the installation of an additional hot wire cutting machine and the replacement of equipment for the mold area. A Rule 278a demonstration was submitted to the AQD on April 20, 2018. In the demonstration, it was shown that due to increases in production, the facility had exceeded the Rule 278(1)(b) exclusion from exemption threshold in 2016 and 2017. Based on this, the Rule 285(2)(b) air permit exemption cannot be used for the installation of the additional hot wire cutting machine and the replacement of equipment for the mold area. Therefore, this is a Rule 201 violation.

A program for compliance may include a completed PTI application for the additional hot wire cutting machine and replacement of equipment for the mold area. An

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application form is available by request, or at the following website:
www.michigan.gov/deqair (in the shaded box on the upper right-hand side of the page)


Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 5, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Michigan Foam Products LLC 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 violation cited above and for the cooperation that was extended to me during my inspection of Michigan Foam Products LLC. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Shaffer
Environmental Quality Analyst
Air Quality Division
616-356-0767

AS:kw

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Chris Ethridge, DEQ
Mr. Malcolm Mead-O'Brien, DEQ