



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

January 31, 2024

Jeff Meyer  
Michigan Foam Products  
1820 Chicago Drive SW  
Wyoming, Michigan 49519

SRN: N3078, Kent County

Dear Jeff Meyer:

**VIOLATION NOTICE**

On January 26, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a Rule 912 notification of an emissions exceedance at Michigan Foam Products located at 1820 Chicago Drive SW, Wyoming, Michigan. A review of this notification and subsequent written report and supporting information was conducted. The purpose of this review was to determine Michigan Foam Products' 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 Renewable Operating Permit (ROP) number MI-ROP-N3078-2021a.

During the review, the following was noted:

Process Description	Rule/Permit Condition Violated	Comments
Batch-type resin pre-expander	Rule 910	Failure to properly install and operate the regenerative thermal oxidizer (RTO).
Batch-type resin pre-expander	MI-ROP-N3078-2021a, EUPLASTICRESIN, Special Condition No. I.3	Exceedance of hourly volatile organic compound (VOC) emission limit.
Batch-type resin pre-expander	MI-ROP-N3078-2021a, EUPLASTICRESIN, Special Condition No. IV.2	Failure to properly achieve a 98.0% VOC destruction efficiency with the RTO.

On December 19, 2023, the AQD staff observed an initial stack test during which the RTO that controls a portion of the emissions from the batch-type resin pre-expander was malfunctioning. The unit was leaking water from both the inlet and outlet, as well as from bolts in the metal in the central area of the unit. Icicles had formed on the unit, and icy patches were present on the ground underneath due to cold ambient temperatures. These observations along with the stack test results detailed below indicate a violation of Rule 910.

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During a review of the Rule 912 report, and follow-up supporting information including the stack test report, the AQD learned that the test results indicated that the three-run average VOC emission rate during the test was 13.7 pounds per hour (pph), which is above the permit limit of 1.13 pph. The test report also found that the destruction efficiency of the unit was a three-run average of 24 percent, which is below the 98.0 percent required by the permit. These constitute a violation of the permit and Rule 910.

The initial Rule 912 notification was received via email on January 26, 2024, and additions to the submittal were requested on January 29, 2024. Michigan Foam Products was also informed that the batch-type resin pre-expander is in non-compliance until a new stack test, with results indicating compliance with permit limits, is conducted.

If Michigan Foam Products 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 review of Michigan Foam Products. 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,



April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

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