



November 5, 2024

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Lansing District Office
Michigan department of Environment, Great lakes and Energy
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Dan:
SUBJECT: Violation Notice

On May 29, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Creative Foam Corporation (Creative Foam) located at 300 N. Alloy Drive, Fenton, Michigan. The purpose of this inspection was to determine Creative Foam'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 159-95B.

The following violations were found and resolved:

1. Safety Data Sheets (SDS) did not contain sufficient data, and environmental data sheets (EDS) were not provided.
 - a. Environmental Data Sheets (EDS) were requested and received for both 2628 and AP131H adhesives. They are kept on file in PLEX for future reference.
2. VOC content as applied minus water was received, but not with water.
 - a. VOC content as applied with water has been provided on the spreadsheets for both the 2628 and AP131H adhesives.
3. VOC emissions calculations determining the volume weighted average VOC content of the materials as applied, on a daily basis were not received.
 - a. Spreadsheet for record keeping updated with the daily VOC content of the materials as applied.



4. VOC rate in tons per 12-month rolling time period was not determined at the end of each month.
 - a. Spreadsheets for record keeping updated with a 12 month rolling time period determined at the end of each month.
5. Hazardous air pollutant (HAP) content was not determined in record keeping.
 - a. Spreadsheets for record keeping updated with the HAP content for both the 2628 and the AP131H adhesives
6. Recordkeeping did not include HAP emissions in an acceptable format.
 - a. Spreadsheets formatted with HAP emissions for daily and monthly usage in pounds and in tons
7. Record keeping did not include HAP containing materials as reclaimed as applicable.
 - a. No HAP containing materials are reclaimed
8. Recordkeeping did not include HAP content in pounds per gallon or pound per pound of each HAP containing material.
 - a. Spreadsheets have been updated to include HAP content in pounds per gallon used
9. Recordkeeping did not include individual and aggregate HAP emissions in a 12-month rolling time period.
 - a. Spreadsheets have been updated to include HAP emissions in a 12-month rolling time period in tons