



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 16, 2024

VIA EMAIL

Robert Spring, General Manager
Creative Foam Corporation
300 North Alloy Drive
Fenton, Michigan 48430

SRN: N2115, Genesee County

Dear Robert Spring:

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.

While reviewing records received in July, August, and September, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-Adhesive Line	PTI 159-95B, EU-Adhesive Line, Special Condition (SC) 1.5	Safety Data Sheets (SDS) did not contain sufficient data, and environmental data sheets (EDS) were not provided.
EU-Adhesive Line	PTI 159-95B, EU-Adhesive Line, SC 1.6b	VOC content as applied minus water was received, but not with water.
EU-Adhesive Line	PTI 159-95B, EU-Adhesive Line, SC 1.6c	VOC emission calculations determining the volume weighted average VOC content of the materials as applied, on a daily basis, were not received.
EU-Adhesive Line	PTI 159-95B, EU-Adhesive Line, SC 1.6e	VOC rate in tons per 12-month rolling time period

		was not determined at the end of each month.
FG-Facility	PTI 159-95B, FG-FACILITY, Special Condition (SC) 2.2	Hazardous air pollutant (HAP) content was not determined in recordkeeping.
FG-Facility	PTI 159-95B, FG-FACILITY, Special Condition (SC) 2.3	Recordkeeping did not include HAP emissions in an acceptable format.
FG-Facility	PTI 159-95B, FG-FACILITY, Special Condition (SC) 2.4b	Recordkeeping did not include HAP containing materials reclaimed, as applicable.
FG-Facility	PTI 159-95B, FG-FACILITY, Special Condition (SC) 2.4c	Recordkeeping did not include HAP content in pounds per gallon or pounds per pound of each HAP containing material used.
FG-Facility	PTI 159-95B, FG-FACILITY, Special Condition (SC) 2.4d	Recordkeeping did not include individual and aggregate HAP emissions in tons per calendar month.
FG-Facility	PTI 159-95B, FG-FACILITY, Special Condition (SC) 2.4e	Recordkeeping did not include individual and aggregate HAP emissions in tons per 12-month rolling time period.

PTI 159-95B, EU-Adhesive Line, SC 1.5 requires the permittee to maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both, as deemed acceptable by the AQD District Supervisor. The provided SDS did not contain sufficient data and were not compliant with SC 1.5. EDS were requested on September 23, 2024, but have not been received.

PTI 159-95B, EU-Adhesive Line, SC 1.6b requires VOC content (minus water and with water) of each material as applied. Only VOC content minus water was received, in violation of SC 1.6b.

PTI 159-95B, EU-Adhesive Line, SC 1.6c requires VOC emission calculations determining the volume-weighted average VOC content of the materials as applied, on a daily basis. The SDS and the facility records did not contain sufficient detail to determine this, in violation of SC 1.6c.

PTI 159-95B, EU-Adhesive Line, SC 1.6e requires VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. These were not calculated per 12-month rolling time period, in violation of SC 1.6e.

Records did not include HAP content as received and as applied, in violation of PTI 159-95B, FG-Facility, SC 2.2.

Records received did not include HAP emissions in a format acceptable to the District Supervisor and were not completed by the 15th of each month for the preceding month, in violation of PTI 159-95B, FG-Facility, SC 2.3.

Records received did not include HAP containing materials reclaimed, as applicable, as required by PTI 159-95B, FG-Facility, SC 2.4b. At this time, it is not clear if any HAP containing materials were reclaimed without being reported, which would be considered a violation.

Records received did not include HAP content in pounds per gallon or pounds per pound of each HAP containing material used as required by PTI 159-95B, FG-Facility, in violation of PTI 159-95B, FG-Facility, SC 2.4c.

Records received did not include monthly individual and aggregate HAP emission calculations in tons per calendar month, in violation of PTI 159-95B, FG-Facility, SC 2.4d.

Records received did not include annual individual and aggregate HAP emission calculations in tons per 12-month rolling time period, in violation of PTI 159-95B, FG-Facility, SC 2.4e.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 6, 2024, (which coincides with 21 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.

Robert Spring
Creative Foam Corporation
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Please submit the written response to Daniel McGeen at EGLE, AQD, Lansing District, at Constitution Hall, P.O. Box 30242, First Floor South, Lansing, Michigan 48909 or McGeenD@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Creative Foam 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 inspection of Creative Foam. 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,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE