



October 18, 2022

Mr. Adam Bognar
Environmental Engineer
Air Quality Division
Michigan Department of Environment, Great Lakes and Energy
27700 Donald Court
Warren, MI 48092-2793

RE: Violation Notice
State Registration Number P0583

Mr. Bognar,

This letter is in response to the Air Quality Division Violation Notice dated September 28, 2022, relating to observations made during an inspection on August 18, 2022, of our operations at 2923 Technology Drive, Rochester Hills, Michigan, and the rule / permit condition allegedly violated.

PTI No. 207-14A, FGPOLYFOAM Section IV – Special Condition 2

The molding cells are operated based on production demands. The dry fabric filters are changed out daily or weekly depending on production levels. They are installed properly when changed out and are secured into the filter framework by clips.

Periodically the molding cells are shut down from production and the associated exhausts are not operating when the cell is not running. During cell restart, the activation of the cell exhaust may pull the filters out of alignment, which is what was observed during the inspection.

To correct the observed conditions, inspections were performed at all mold cells having filters and any misaligned filters were secured. Photographic evidence of corrections for the subject emissions units EUPOLY4, EUPOLY6, EUPOLY8, and EUPOLY10 is attached. We also implemented a Daily Filter Installation Check process on August 23, 2022, for a 30-day period to monitor satisfactory installation (record attached).

As corrective action, we have added a filter installation verification checkbox to our existing Maintenance Daily PM Checklist form for continual conformance (highlighted area on attached form).

PTI No. 207-14A, FGPOLYFOAM Section III – Special Condition 4

Our current permit to install (PTI) is based on the use of hazardous air pollutants and volatile organic compounds, and the associated limits were established to restrict our facility's potential to emit to less than the major source threshold to opt out of any applicable National Emission Standards for Hazardous Air Pollutants and the Renewable Operating Permit program. The process / operational restrictions in Special Condition 4 controls the overall emissions by limiting both the emission units where coatings may be applied and the specific emission units that may be in operation at the same time.



Since our current PTI was issued, we have eliminated the use of solvent-based paints, thereby significantly reducing the pollutants listed in our permit. We now use only water-based paints.

It is our belief that the spraying of water-based paint coatings at EUPOLY10 does not constitute a violation of the applicable legal requirements given the limits originally placed on EUPOLY10 were directly associated with pollutants we either no longer emit or have significantly reduced (the evidence of which has been previously provided to you), and based on the following:

- The spraying of mold release is specifically permitted at EUPOLY10
- The VOC content of mold release used at EUPOLY10 is 5.5 lbs/gal.
- The VOC content of water-based paint used at EUPOLY10 is 0.08 lbs/gal.

Therefore, we are requesting that EGLE AQD withdraw this violation.

Safety Data Sheets for the mold release and water-based paint are attached.

It is the intent of FoamPartner to apply for a new permit to install by November 30, 2022, to establish less stringent conditions to reflect our reduction of HAP and VOC usage.

Should you have any questions or require additional information, please contact me via telephone 248-568-3966 or email kurkowski.michael@recticel.com.

Regards,

FoamPartner Americas, Inc.

A handwritten signature in blue ink, appearing to read "Michael Kurkowski".

Michael Kurkowski
HSE Manager

cc: Jenine Camilleri, EGLE