

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

B600127422

FACILITY: Herman Miller, Inc		SRN / ID: B6001
LOCATION: 855 E. Main Ave., ZEELAND		DISTRICT: Grand Rapids
CITY: ZEELAND		COUNTY: OTTAWA
CONTACT: Fred Gordon , Environmental Manager		ACTIVITY DATE: 09/18/2014
STAFF: Denise Plafcan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) conducted an announced scheduled inspection of the Herman Miller Main Plant. . Since Fred Gordon, the environmental contact for the facility, is at another Herman Miller location on the south side of Holland DP announced the scheduled to be sure he could meet at the Main Plant. The purpose of the scheduled inspection was to determine compliance with Permit No. MI-ROP-B6001-2014 State and Federal air quality rules and regulations.

Following the inspection DP conducted surveillance of the area. There were no odors, fugitive emissions or malfunctions noted. In addition to Fred Gordon, Martine Carlson, the plant environmental contact, also participated in the inspection. Prior to entering the plant there was a brief discussion with Fred regarding the purpose of the inspection and the typical procedures. DP also provided a copy of the Environmental Inspections pamphlet and explained the survey mentioned in the pamphlet.

Herman Miller, Inc. at 855 E. Main manufactures office furniture it operates two to three shifts five days a week and employees ~1500 at the Main site in manufacturing. All metal coating is done at another facility or out-sourced. Upholstery and foam for chair manufacturing are also out-sourced. Permit No. MI-ROP-B6001-2014 is divided into two sections, the office furniture manufacturing plant and the wood waste boiler. Section 1 of the RO Permit is the manufacturing plant and is composed of wood finishing lines, adhesive application stations, woodworking equipment and maintenance parts washers. The wood finishing lines include a powder coat line, the UV topcoat/sealer line and the Roades line. Coatings applied in the operations are typically liquid stains, topcoats and sealers and wood powder coat. The company has replaced all coatings with water based coatings. The woodworking and machining equipment consists of carving, cutting, routing, turning, drilling, sawing, sanding, planing and buffing wood components. Exhaust from the woodworking machinery is directed to one of three dust collection systems composed of a total of seven dust collectors. Depending upon external temperature, the exhaust from the dust collectors can either be internally or externally vented. Section 2 of the RO Permit contains the wood waste boiler, emergency power generators and cold cleaners. The wood waste boiler is used to generate nonprocess steam and is permitted to burn waste material from Herman Miller, currently the unit is down while the new unit is under construction.

The UV coatings are water-based and contain less than 4% VOCs. Water or non-volatile non-HAP solvents are used as clean-up solvent. EURHODESLINE3 is a horseshoe shaped hand-applied (using HVLP) coating line. A conveyor moves wood furniture parts through four spray booths, equipped with mat panel filters, and two ovens. Parts on EURHODESLINE3 may go through more than once and sometimes go through EUUVFINLINE1 as well.

The UV process begins with placing the parts onto a conveyor. All parts are separated by an electronic chip that contains all the information regarding the part, dimensions, stain color, area to be coated ith a sealer or topcoat along with order information. The chip is electronically read at each stage which dictates the parameters of the automatic and manual operations on the line. The first step is to dust the part and then warm it using IR lights to improve the coating adhesion. The coating is applied with high transfer efficiency applicators in a completely enclosed automatic reciprocating spray booth. The booth itself is contained within a closed room, the temperature and humidity of filtered fresh air is adjusted correctly for the part and the coating before it enters the spray booth. The part leaves the room on the conveyor and enters the first section of the dryer or laminar where warm air is blown across the surface of the piece to help remove the water. The second section of the dryer is where high velocity warm air is blown directly down onto the part to complete the drying. The purpose of the horizontal drying is to prevent quality issues and blowing the coating off of the part. After the water is removed the parts enter the UV cure oven where the coating is cross-linked using UV lights. The parts continue on the conveyor where they are manually inspected, the sealer coat is lightly sanded with an automated sanding

machine or manually for the sides, dusted with ostrich feathers and then returned to the beginning of the line to circulate through for the other side of the part or for a topcoat. However, after the topcoat cure oven the part is then moved to assembly and packaging. A part may travel through the process between one to four times. The coating is 38% solids and they were able to reduce dry time from 15 minutes down to 4.

All Sections with No Applicable requirements were removed from this inspection report, which accounts for some areas with nonconsecutive numbering.

SOURCE-WIDE CONDITIONS DESCRIPTION

All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

I. EMISSION LIMIT(S)

Each Individual HAP 9 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month August 2014 was the highest month 6.09 tons of VOC well below the individual HAPS limit. Aggregate HAPs 22 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month August 2014 was the highest month 6.09 tons of VOC well below the aggregate HAPS limit.

VI. MONITORING/RECORDKEEPING

Records are being maintained to demonstrate compliance.

IX. OTHER REQUIREMENT(S)

Semiannual and annual compliance reports are being submitted as required.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Flexible Group ID
EURHODESLINE3	Rhodes line applies stains and finishes to wood furniture parts. A conveyor moves parts through four spray booths equipped with panel filters and two ovens.	FGGENERALPERMIT FGNESHAPJJ
EUUVFINLINE1	A UV coating line composed of a panel cleaner for dust, IR board preheater, spray booth, two section drying oven to remove the water and a UV oven to cure the part.	FGGENERALPERMIT FGNESHAPJJ
EURULE287	Any emission unit using less than 200 gallons of coating per month, that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c).	FGGENERALPERMIT FGNESHAPJJ FGRULE287(c)
EUFORMCOAT	A wood powder-coat operation.	FGGENERALPERMIT FGNESHAPJJ

EUDUSTCOLLECTOR1	A 60,000 cubic feet per minute (cfm) dust collection system serving primarily wood working machinery. One of five located north of Building D. The system collects waste materials from various types of machines that perform cutting, shaping, sanding, boring, edge profiling, edge banding, etc., operations on office furniture components.	FGDUSTCOLLECTORS FGDUSTCOLLECTORS-CAM
EUDUSTCOLLECTOR2	A 60,000 cfm dust collection system serving primarily wood working machinery. One of five located north of Building D. The system collects waste materials from various types of machines that perform cutting, shaping, sanding, boring, edge profiling, edge banding, etc., operations on office furniture components.	FGDUSTCOLLECTORS FGDUSTCOLLECTORS-CAM
EUDUSTCOLLECTOR3	A 60,000 cfm dust collection system serving primarily wood working machinery. One of five located north of Building D. The system collects waste materials from various types of machines that perform cutting, shaping, sanding, boring, edge profiling, edge banding, etc., operations on office furniture components.	FGDUSTCOLLECTORS FGDUSTCOLLECTORS-CAM
EUDUSTCOLLECTOR4	A 75,000 cfm dust collection system serving primarily wood working machinery. Located north of Building G. The system collects waste materials from various types of machines that perform cutting, shaping, sanding, boring, edge profiling, edge banding, etc., operations on office furniture components.	FGDUSTCOLLECTORS FGDUSTCOLLECTORS-CAM
EUDUSTCOLLECTOR5	A 75,000 cfm dust collection system serving primarily wood	FGDUSTCOLLECTORS FGDUSTCOLLECTORS-CAM

	working machinery. One of five located north of Building D. The system collects waste materials from various types of machines which perform cutting, shaping, sanding, boring, edge profiling, edge banding, etc., operations on office furniture components.	
EUDUSTCOLLECTOR6	A 75,000 cfm dust collection system serving primarily wood working machinery. Located north of Building F. The system collects waste materials from various types of machines that perform cutting, shaping, sanding, boring, edge profiling, edge banding, etc., operations on office furniture components.	FGDUSTCOLLECTORS FGDUSTCOLLECTORS-CAM
EUDUSTCOLLECTOR7	A 60,000 cfm dust collection system serving primarily wood working machinery. One of five located north of Building D. The system collects waste materials from various types of machines that perform cutting, shaping, sanding, boring, edge profiling, edge banding, etc., operations on office furniture components.	FGMISC331 FGDUSTCOLLECTORS-CAM
EUMISC331	Any miscellaneous dust collectors exempt under Rule 336.1285(I)(6).	FGMISC331
EUCOLDCLEANER1	This group consists of miscellaneous cold cleaners installed after 1979 pursuant to Rule 281(h).	FGCOLDCLEANERS1

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGGENERALPERMIT	The UV finish line, Rhodes finish line and the combined emissions from any grandfathered coating lines,	EURHODESLINE3 EUUVFINLINE1 EURULE287 EUFORMCOAT

	coating lines covered by a general permit, any permit to install issued pursuant to Rule 201, and any coating line exempt from the requirement to obtain a permit pursuant to Rule 287 and/or Rule 290.	
FGNESHAPJJ	This flexible group consists of all equipment at the stationary source including equipment covered by NSR permits, grandfathered equipment, and exempt equipment involved in surface coating of wooden furniture and that meet the requirements in 40 CFR Part 63, Subpart JJ, and are thereby subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture.	EURHODESLINE3 EUUVFINLINE1 EURULE287 EUFORMCOAT
FGDUSTCOLLECTORS	Dust collection systems serving primarily wood working machinery from various types of machines that perform cutting, shaping, sanding, boring, edge profiling, edge banding, etc., operations on office furniture components.	EUDUSTCOLLECTOR1 EUDUSTCOLLECTOR2 EUDUSTCOLLECTOR3 EUDUSTCOLLECTOR4 EUDUSTCOLLECTOR5 EUDUSTCOLLECTOR6
FGMISC331	EUDUSTCOLLECTOR7 and miscellaneous dust collectors exempt under Rule 336.1285(l) (6).	EUDUSTCOLLECTOR7 EUMISC331
FGDUSTCOLLECTORS-CAM	This flexible group consists of seven dust collector emission units that are subject to Compliance Assurance Monitoring (CAM).	EUDUSTCOLLECTOR1 EUDUSTCOLLECTOR2 EUDUSTCOLLECTOR3 EUDUSTCOLLECTOR4 EUDUSTCOLLECTOR5 EUDUSTCOLLECTOR6 EUDUSTCOLLECTOR7
FGRULE287(c)	Any emission units using less than 200 gallons of coating per month, that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c).	EURULE287
FGCOLDCLEANERS1	This group consists of miscellaneous cold cleaners installed after 1979 pursuant to Rule 281(h).	EUCOLDCLEANER1

FGGENERALPERMIT FLEXIBLE GROUP CONDITIONS DESCRIPTION

One or more coating lines, where each coating line is a single series in a coating process and is comprised of

one or more coating applicators and any associated flash-off areas, drying areas, and ovens wherein one or more surface coatings are applied and subsequently dried or cured. Coating lines may be used to coat any substrate except cans, coils, large appliances, metal furniture, magnet wire, fabrics, paper, vinyl, flat wood paneling, or graphic arts lines.

Emission Units: EURHODESLINE3, EUUVFINLINE1, EURULE287, EUFORMCOAT

POLLUTION CONTROL EQUIPMENT

For spray application: Dry filters or a water curtain for particulate control.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	COMPLIANCE
1. VOC	2000 pounds	per calendar month per coating line determined at the end of each calendar month	EUUVFINLINE1 coating line and clean-up operations EURHODESLINE3 coating line and purge and clean-up operations	August 2014 was the highest month on the UV line at 1360.80 pounds of VOC.
2. VOC	10.0 tons	per year per coating line based on a 12-month rolling time period determined at the end of each calendar month	EUUVFINLINE1 coating line and clean-up operations EURHODESLINE3 coating line and purge and clean-up operations	August 2014 was the highest month on the UV line at 4.9 tons of VOC.
3. VOC	30.0 tons	per year for all coating lines combined based on a 12-month rolling time period determined at the end of each calendar month	EUUVFINLINE1 EURHODESLINE3 EUFORMCOAT EURULE287 all exempt and grandfathered coating lines and all associated purge and clean-up operations	August 2014 was the highest month 6.09 tons of VOC.

III. PROCESS/OPERATIONAL RESTRICTION(S)

High volume-low pressure (HVLP) spray or equivalent technology with equal or better transfer efficiency (e.g., electrostatic spray, dip, flowcoat, roller, dip-spin). Compliant applicators are being used throughout the plant.

The permittee shall not operate any spray coating process unless dry filters or a water curtain is installed and operating properly. Dry filters were operational on EURHODESLINE3 and water filter system was operational on EUUVFINLINE1

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. No testing was requested as part of this compliance inspection.

VI. MONITORING/RECORDKEEPING

Records are being maintained to demonstrate compliance.

IX. OTHER REQUIREMENT(S)

All waste coatings and reducers shall be captured and stored in closed containers and be disposed of in an

FGNESHAPJJ1
FLEXIBLE GROUP CONDITIONS
DESCRIPTION

This flexible group consists of all equipment at the stationary source including equipment covered by NSR permits, grandfathered equipment, and exempt equipment involved in surface coating of wooden furniture and that meet the requirements in 40 CFR Part 63, Subpart JJ, and are thereby subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture.

Emission Units: EURHODESLINE3, EUUVFINLINE1, EURULE287, EUFORMCOAT

III. PROCESS/OPERATIONAL RESTRICTION(S)

All emission units subject to 40 CFR, Part 63, Subpart JJ shall comply with the Work Practice Standards noted in 40 CFR 63.803. Complying with the Work Practice Plan. Training records were reviewed on site and are current.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years.

Performance test methods shall be used as provided in Certified Product Data Sheet (CPDS) to calculate liquid coating Volatile Hazardous Air Pollutant (VHAP) content. No testing was required company uses CPDS to comply using the averaging approach. Currently their average is 0.00 pounds of VHAP/pound of solids as applied

The permittee shall comply with the requirements of 40 CFR 63.805. They are in compliance

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years.

Recordkeeping shall be kept on a monthly basis. The company maintains all the records on a monthly basis, see attached.

1. Finishing Operations - Averaging Approach

The permittee following the compliance method in 40 CFR 63.804(a)(1) or (d)(1), shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1. The company is using the averaging approach even though they are at 0.00 pounds of VHAP/pound of solids as applied in case a non-compliant coating is needed for historical product matching.

2. Work Practice Plan

The permittee shall maintain on-site the work practice implementation plan and all records All Work Practice Plans are being maintained as required and are in compliance.

VII. REPORTING

All reporting is being submitted as required.

IX. OTHER REQUIREMENT(S)

The permittee shall develop and implement a written startup, shutdown and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR, Part 63, Subpart JJ. This is part of their Work Implementation and Training plan

FGDUSTCOLLECTORS FLEXIBLE GROUP CONDITIONS
DESCRIPTION

Dust collection systems serving primarily wood working machinery from various types of machines that perform cutting, shaping, sanding, boring, edge profiling, edge banding, etc., operations on office furniture components.

Emission Units: EUDUSTCOLLECTOR1, EUDUSTCOLLECTOR2, EUDUSTCOLLECTOR3, EUDUSTCOLLECTOR4, EUDUSTCOLLECTOR5, EUDUSTCOLLECTOR6

POLLUTION CONTROL EQUIPMENT Baghouses

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	COMPLIANCE

1. Particulate	0.01 pound per 1,000 pounds of exhaust gases ²	calculated on a dry gas basis	EUDUSTCOLLECTOR1 EUDUSTCOLLECTOR2 EUDUSTCOLLECTOR3 EUDUSTCOLLECTOR4 EUDUSTCOLLECTOR5 EUDUSTCOLLECTOR6	Testing of baghouses was not required as part of this compliance inspection.
2. Particulate	5.4 pounds ²	per hour	EUDUSTCOLLECTOR1 EUDUSTCOLLECTOR2	Based on the attachment submitted with the 2013 MAERS report plantwide for all dust collectors the highest pound per hour monthly number was at 2.72 lbs. per hour in August 2013
3. Particulate	23.65 tons ²	per year based on a 12-month rolling time period determined at the end of each calendar month	EUDUSTCOLLECTOR1 EUDUSTCOLLECTOR2	Based on the attachment submitted with the MAERS report plantwide for all dust collectors the tons per year for all of 2013 was 2.05 tons.
4. Particulate	3.4 pounds ²	per hour	EUDUSTCOLLECTOR5	Based on the attachment submitted with the MAERS report plantwide for all dust collectors the highest pound per hour monthly number was at 2.72 lbs. per hour in August 2013
5. Particulate	14.8 tons ²	per year based on a 12-month rolling time period determined at the end of each calendar month	EUDUSTCOLLECTOR5	Based on the attachment submitted with the MAERS report plantwide for all dust collectors the tons per year for all of 2013 was 2.05 tons.

III. PROCESS/OPERATIONAL RESTRICTION(S)

The permittee shall not operate the woodworking equipment unless the appropriate dust collectors are installed and operating properly. Company uses both a pressure drop alarm and broken bag alarm to assure the equipment is operating properly

VI. MONITORING/RECORDKEEPING

Records are being maintained to demonstrate compliance.

IX. OTHER REQUIREMENT(S)

The permittee shall implement and maintain an acceptable Preventative Maintenance Plan and Malfunction Abatement Procedures. They are following their Preventative Maintenance Plan and their Malfunction Abatement Procedures.

FGMISC331 FLEXIBLE GROUP CONDITIONS DESCRIPTION

This group consists of Rule 331 subject emission units that are exempt from Rule 201.

Emission Units: EUDUSTCOLLECTOR7, EUMISC331

POLLUTION CONTROL EQUIPMENT Dust Collector

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	COMPLIANCE
1. Particulate	0.01 pound per 1,000 pounds of exhaust gases, for each individual process	calculated on a dry gas basis	EUDUST- COLLECTOR7 EUMISC331	Testing of baghouses was not required as part of this compliance inspection.

III. PROCESS/OPERATIONAL RESTRICTION(S)

The permittee shall not operate the process unless the associated dust collection system is installed and operating properly. (R 336.1910)

VI. MONITORING/RECORDKEEPING

Records are being maintained to demonstrate compliance.

IX. OTHER REQUIREMENT(S)

The permittee shall implement and maintain an acceptable Preventative Maintenance Plan and Malfunction Abatement Procedures. The Preventative Maintenance Plan and MAP is acceptable and is being implemented.

FGDUSTCOLLECTORS-CAM FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group consists of seven dust collector emission units that are subject to CAM.

Emission Units: EUDUSTCOLLECTOR1, EUDUSTCOLLECTOR2, EUDUSTCOLLECTOR3, EUDUSTCOLLECTOR4, EUDUSTCOLLECTOR5, EUDUSTCOLLECTOR6, EUDUSTCOLLECTOR7

POLLUTION CONTROL EQUIPMENT

Seven baghouses:

EUDUSTCOLLECTOR1, EUDUSTCOLLECTOR2, EUDUSTCOLLECTOR3 rated at 60,000 scfm

EUDUSTCOLLECTOR4, EUDUSTCOLLECTOR5,

EUDUSTCOLLECTOR6 rated at 75,000 scfm

EUDUSTCOLLECTOR7 rated at 50,000 scfm

VI. MONITORING/RECORDKEEPING

Records are being maintained to demonstrate compliance.

VII. REPORTING

Semiannual and annual compliance reports including excursions/exceedances and deviations are being submitted as required.

OTHER REQUIREMENTS

The permittee shall notify the appropriate AQD District Office of the need to modify the monitoring plan if the approved monitoring plan is found to be inadequate and shall submit a proposed modification to the plan if appropriate. Appropriate notification and updates have been submitted as required.

The permittee shall comply with all applicable requirements of 40 CFR, Part 64.

FGRULE287(c) FLEXIBLE GROUP CONDITIONS DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c). Currently, there aren't any emission units using a Rule 287(c). The conditions of FGRULE287 are not applicable and the remainder of this table has been deleted from this inspection report.

FGCOLDCLEANERS1 FLEXIBLE GROUP CONDITIONS DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. The cold cleaner at Herman Miller is considered new since it was installed in July 1979. The cold cleaner observed is Rule 201 exempt by Rule 281(h), is less than 10 square feet surface area, uses compliant solvents and labeled with appropriate operating instructions. During the inspection the top of the cleaner was open without anyone using the cold cleaner. I reminded the company's representatives to be sure to the lid closed when not in use.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBOILER3	This is the same emission unit as EUBOILER3162 before the modifications according to PTI No. 162-13 are installed and operational. The boiler is a wood waste fired boiler used to generate steam primarily for on-site space heating and cooling, some process steam heating and the capability to generate electricity via a steam driven turbine generator. The fuel consists of wood and resinated wood waste produced on-site. This unit will become subject to rule 40 CFR Part 63, Subpart JJJJJJ (Area Source Boiler MACT) as an existing Area Source Boiler.	12/14/1981 / 11/1/2008/	FGBOILER3-CAM
EUBOILER3162	This is the same emission unit as	12/14/1981 / 11/1/2008/	FGBOILER3-CAM

	EUBOILER3 after the modifications according to PTI No. 162-13 are installed and operational. The boiler is a wood waste fired boiler used to generate steam primarily for on-site space heating and cooling, some process steam heating and the capability to generate electricity via a steam driven turbine generator. The fuel consists of wood and resinated wood waste produced on-site. This unit is subject to rule 40 CFR Part 63, Subpart JJJJJJ (Area Source Boiler MACT) as an existing Area Source Boiler.		
EURICE1-CCEMGEN	A 900 hp, stationary, diesel-fired internal combustion engine used for emergency/back-up electric generation, exempt from Rule 201 pursuant to Rule 285(g).	6/30/2001 / NA	FGEMERGENCYRICE FGDIESELFIRE
EURICE2-BLDGBEMGEN	125 KW Compression Ignition Emergency Generator	1994	FGEMERGENCYRICE FGDIESELFIRE
EURICE3-ECMGEN	100 KW compression Ignition emergency generator	1995	FGEMERGENCYRICE FGDIESELFIRE
EURICE4-FIREPUMP	115 HP Compression ignition FIRE PUMP	1976	FGEMERGENCYRICE FGDIESELFIRE
EURICE5-FMEMGEN	45 KW Spark Ignition emergency generator	2004	FGEMERGENCYRICE
EURICE6-ITA/CEMGEN	200 KW Spark Ignition Emergency Generator	2001	FGEMERGENCYRICE
EUCOLDCLEANER2	Cold cleaners	7/2/1979 / NA	FGCOLDCLEANERS2

EUBOILER3 EMISSION UNIT CONDITIONS**DESCRIPTION**

This is the same emission unit as EUBOILER3162 before the modifications according to PTI No. 162-13 are installed and operational. The boiler is a 28 MMBtu/hour wood waste fired boiler used to generate steam primarily for on-site space heating and cooling, some process steam heating and the capability to generate electricity via a steam driven turbine generator. The fuel consists of wood and resinated wood waste produced on-site. This unit is subject to rule 40 CFR, Part 63, Subpart JJJJJJ (Area Source Boiler MACT) as an existing Area Source Boiler.

This equipment was not evaluated for compliance during this inspection since it has been decommissioned and located in an active construction site. The new boiler system should be operational in October.

EUBOILER3162 EMISSION UNIT CONDITIONS**DESCRIPTION**

This is the same emission unit as EUBOILER3 after the modifications according to PTI No. 162-13 are installed and operational. The 28 MMBtu/ hour boiler is a wood waste fired boiler used to generate steam primarily for on-site space heating and cooling, some process steam heating and the capability to generate electricity via a steam driven turbine generator. The fuel consists of wood and resinated wood waste produced on-site. This unit is subject to rule 40 CFR, Part 63, Subpart JJJJJJ (Area Source Boiler MACT) as an existing Area Source Boiler.

This equipment was not evaluated for compliance during this inspection since it is still under construction and has located in an active construction site. The company anticipates this system should be operational in October 2014 and stack testing in November 2014.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGBOILER3-CAM	This emission unit consists of the control devices related to EUBOILER3 and EUBOILER3162 that are subject to CAM.	EUBOILER3 EUBOILER3162
FGDIESELFIRE	Diesel-fired emergency/back-up equipment used for electrical generation including EURICE1-CCEMGEN and all other exempt, permitted or grandfathered diesel-fired emergency/back-up equipment.	EURICE1-CCEMGEN EURICE2-BLDGBEMGEN EURICE3-ECMGEN EURICE4-FIREPUMP
FGEMERGENCYRICE	All compression ignition and spark ignition emergency/back-up equipment used for electrical generation and fire suppression subject to 40 CFR 63, Subpart ZZZZ.	EURICE1-CCEMGEN EURICE2-BLDGBEMGEN EURICE3-ECMGEN EURICE4-FIREPUMP EURICE5-FMEMGEN EURICE6-ITA/CEMGEN
FGCOLDCLEANERS2	This group consists of miscellaneous cold cleaners installed after 1979 pursuant to Rule 281 (h).	EUCOLDCLEANER2

FGBOILER3-

CAM FLEXIBLE GROUP CONDITIONS**DESCRIPTION**

This emission unit consists of the control devices related to EUBOILER3 and EUBOILER3162 that are subject to CAM. This equipment was not evaluated for compliance during this inspection since the old system has been decommissioned, the new system is not operational and the boiler operations are located in an active construction site. The new boiler system should be operational in October.

FGDIESELFIRE FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Diesel-fired emergency/back-up equipment used for electrical generation including all exempt, permitted or grandfathered diesel-fired emergency/back-up equipment.

Emission Units: EURICE1-CCEMGEN, EURICE2-BLDGBEMGEN, EURICE3-ECEMGEN, EURICE4-FIREPUMP

III. PROCESS/OPERATIONAL RESTRICTION(S)

The permittee shall burn only diesel fuel rated less than 0.28 pounds sulfur dioxide per million Btu of heat input in FGDIESELFIRE equipment. Compliance with this limit shall be considered compliance with the following applicable requirement which has been subsumed under this streamlined requirement: (R 336.1402(1)). They are using compliance diesel fuel.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

The permittee shall maintain a complete record of fuel oil specifications and/or a fuel analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for American Society for Testing and Materials (ASTM) specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance. Records demonstrating compliance are attached

VII. REPORTING

All Semiannual, annual and reporting of monitoring and deviations are being submitted as required.

FGEMERGENCYRICE FLEXIBLE GROUP CONDITIONS**DESCRIPTION**

Diesel-fired emergency/back-up equipment used for electrical generation all exempt, permitted or grandfathered diesel-fired emergency/back-up equipment subject to requirements applicable to area source emergency equipment under 40 CFR 63, Subpart ZZZZ Not evaluated as part of this compliance inspection.

FGCOLDCLEANERS1 FLEXIBLE GROUP CONDITIONS**DESCRIPTION**

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. Cold cleaners in the boiler area were not evaluated since that area is under construction.

Based on the physical inspection and the amount and materials used the facility appears to be in compliance with state and federal Air Quality rules and regulations.

NAME



DATE

9-25-14

SUPERVISOR



