



State Registration Number

N5569

Michigan Department of Environmental Quality
Air Quality Division

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number

MI-ROP-N5569-2009

Haworth, Inc. Big Rapids Components Steel & Wood

SRN: N5569

Located at

300 N. Bronson,
Big Rapids, Michigan 49307

Permit Number: MI-ROP-N5569-2009

Staff Report Date: February 16, 2009

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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February 16, 2009 STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	Haworth, Inc. Big Rapids Components Steel & Wood 300 N. Bronson Big Rapids, Michigan 49307
Source Registration Number (SRN):	N5569
North American Industry Classification System (NAICS) Code:	337214
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200700147
Responsible Official:	Tom Weiss, Production Group Manager, 616-393-1919
AQD Contact:	Denise Plafcan, Senior Environmental Quality Analyst, 616-356-0259
Date Permit Application Submitted:	November 27, 2007
Date Application Was Administratively Complete:	December 4, 2007
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	February 16, 2009
Deadline for Public Comment:	March 18, 2009

Source Description

Haworth, Inc. Big Rapids Components manufactures metal and wood office furniture and is located just to the east of the city of Big Rapids in Mecosta County. The facility is located in an industrial park area with a few residents within a mile. The actual site is composed of two buildings with the wood furniture and coating building to the north and the newer metal furniture manufacturing building to the south. The two buildings are connected by a vacant parcel of land which is also owned by Haworth, Inc. and used for underground cables. Though the site is made up of two structures, there is only one responsible official for both buildings and therefore only one Section to the ROP. The wood furniture building includes woodworking and manufacturing equipment, and an ultraviolet wood furniture coating line. The metal furniture building includes metal stamping, welding, cleaning, assembly operations, an E-coat dip tank and associated ovens, a powder coat line and associated cure oven, and two rack burn-off ovens controlled by thermal oxidizers.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2008** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	<1
Lead (Pb)	<1
Nitrogen Oxides (NO _x)	<1
Particulate Matter (PM)	1.5
Sulfur Dioxide (SO ₂)	<1
Volatile Organic Compounds (VOCs)	2.5
Individual Hazardous Air Pollutants (HAPs) **	NA
Total Hazardous Air Pollutants (HAPs)	2.5

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in Mecosta County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing promulgated in Title 40 of the Code of Federal Regulations (CFR), Part 63, Subparts A and JJ.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Title 40 of the Code of Federal Regulations (CFR), Part 52.21, because at the time of New Source Review permitting the potential to emit of each criteria pollutant was less than 100 tons per year.

The coating limit of 2.75 pounds per gallon minus water as applied is below the 3.0 pounds per gallon minus water as applied limit from Rule 610 and is considered the Best Available Control Technology under Rule 702(a). The dip tank application method is considered 100% transfer efficiency and therefore BACT. No additional control equipment is required.

At the time Permit to Install No. 301-95 for EUECOAT was evaluated, all toxic pollutants emitted met the applicable toxic screening levels in Rule 224/225.

FGNSPSEE at the stationary source is subject to the New Source Performance Standards for Surface Coating of Metal Furniture promulgated in Title 40 of the Code of Federal Regulations, Part 60, Subparts A and EE.

FGNESHAPJJ at the stationary source is subject to the NESHAP for Wood Furniture Manufacturing promulgated in Title 40 of the Code of Federal Regulations (CFR), Part 63, Subparts A and JJ.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the DEQ "Procedure for Evaluating Periodic Monitoring Submittals."

FGDUSTCOLLECTORS at the stationary source is subject to the federal Compliance Assurance Monitoring (CAM) rule under Title 40 of the Code of Federal Regulations (CFR), Part 64. This emission unit has a control device and potential pre-control emissions of particulate greater than the major source threshold level.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document. PTIs issued after the effective date of ROP No. 199800010 are identified in Appendix 6 of the ROP.

The following table lists all individual PTIs that were incorporated into previous ROPs.

PTI Number			
301-95			

Equivalent Requirements

The following table lists explanations of any equivalent requirements included in the draft permit pursuant to Rule 213(2)(c). Equivalent requirements are enforceable applicable requirements which are equivalent to the applicable requirements contained in the original PTI, a Consent Order/Judgment, and/or the State Implementation Plan.

Emission Unit/Flexible Group ID	Equivalent Requirement Discussion
EUECOAT	SVBAKEOVEN maximum stack diameter was changed from a rectangular measurement of 14 X 21 inches with a surface area at the opening of 2.04 square feet to a more stringent circular diameter of 19 inches with a surface area at the opening of 1.97 square feet.

Non-applicable Requirements

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

The following table lists processes that were included in the ROP application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

Exempt Emission Unit ID	Description of Exempt Emission Unit	ROP Exemption	PTI Permit Exemption
EUAIRHANDLING	Air handling units	R 336.1212(4)(b)	R 336.1282(b)
EUGENERATOR	Back-up generator	R 336.1212(4)(b)	R 336.1285(g)
EUWATERHEATERS	Natural gas water heaters	R 336.1212(4)(b)	R 336.1282(b)
EUBOILER1 EUBOILER2	Natural gas fired boilers used for building and process heating, each rated at less than 50mm BTU/hr. Max. design capacity of the units 6,000,000 BTU/hr and 1,000,000 BTU/hr	R 336.1212(3)(c)	R 336.1282(b)(i)

Draft ROP Terms/Conditions Not Agreed to by Applicant

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by the DEQ

The AQD proposes to approve this permit. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Heidi G. Hollenbach, Grand Rapids District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.



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March 19, 2009 STAFF REPORT ADDENDUM

Purpose

A Staff Report dated February 16, 2009, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Tom Weiss, Production Group Manager, 616-393-1919
AQD Contact:	Denise Plafcan, Senior Environmental Quality Analyst, 616-356-0259

Summary of Pertinent Comments

No pertinent comments were received during the 30-day public comment period.

Changes to the February 16, 2009 Draft ROP

No changes were made to the draft ROP.

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Air Quality Division

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RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-N5569-2009a

**November 8, 2010 STAFF REPORT FOR RULE
217(2) REOPENING**

Purpose

On May 5, 2009, the Department of Natural Resources and Environment, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-N5569-2009 to Haworth Inc., pursuant to R 336.1214. Once issued, the AQD is required to reopen the ROP as described in R 336.1217. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1217.

General Information

Responsible Official:	Louis Cowie, Manufacturing Manager 616-393-3134
AQD Contact:	Denise Plafcan, Senior Environmental Quality Analyst, 616-356-0259
Date Public Comment Begins:	November 8, 2010
Deadline for Public Comment:	December 8, 2010

Regulatory Analysis

The AQD has determined that the ROP must be reopened because during a review of the Compliance Assurance Monitoring (CAM) rule and the monitor downtime requirement, an error in the monitoring time period was discovered. The CAM rule requires a minimum of monitoring data every 24 hours. The purpose of the reopening is to incorporate 24 hour monitoring conditions as required in 40 CFR 64.3 (b)(4)(iii).

Description of Changes to the ROP

The requirements in Table FGDUSTCOLLSCAMPLAN, Section VI, MONITORING/RECORDKEEPING were revised to incorporate the new broken bag detector alarm system, now installed on all three dust collectors, to continuously monitor operation of the baghouse and fulfill the 24-hour monitoring and recordkeeping requirement.

Action Taken by the Department

The AQD proposes to approve this change to ROP No. MI-ROP-N5569-2009, which was reopened by the AQD in order to require the collection of monitoring data at least once every 24-hour period. A final decision on the approval of the revised ROP will not be made until the public and any affected states have had an opportunity to comment on the proposed changes to the ROP and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is Heidi G. Hollenbach, Grand Rapids District Supervisor. The final determination for approval of the revised ROP will be based on a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by the public, any affected states or the USEPA.