

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
B7186

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B7186-2018

HAWORTH, INC.

SRN: B7186

Located at:

One Haworth Center, Holland, Allegan County, Michigan 49423

Permit Number: MI-ROP-B7186-2018

Staff Report Date: January 22, 2018

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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RENEWABLE OPERATING PERMIT

January 22, 2018 STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an 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 Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP 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 One Haworth Center Holland, Michigan 49423
Source Registration Number (SRN):	B7186
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:	201700083
Responsible Official:	Mike Reilly, Manufacturing Manager 616-393-1046
AQD Contact:	Matt Deskins, Environmental Quality Analyst 269-567-3542
Date Application Received:	June 15, 2017
Date Application Was Administratively Complete:	June 15, 2017
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	January 22, 2018
Deadline for Public Comment:	February 21, 2018

Source Description

Haworth, Inc. (Facility) manufactures office furniture, such as partitions, work surfaces, cabinets, and shelves. Both wood and metal raw materials are used.

The Facility has three plants under one roof; steel, panels, and laminated products:

- In the steel plant, volatile organic compounds (VOC) containing coatings are applied by electrostatic spray guns in a series of booths and in E-coat tanks.
- The panels plant houses the partition making process. There are also powder coating operations in the panels plant.
- In the laminated products plant, there are many woodworking operations with particulate emission controls. Various other small operations using adhesives or other coatings are located throughout the plant. They have added a wood stain and topcoat line using low VOC materials.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System for the year **2016**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Particulate Matter	2.9
Volatile Organic Compounds	9.6

The following table lists HAP emissions as calculated for the year:

Individual Hazardous Air Pollutant (HAP) **	Tons per Year
NA	NA
Total HAP	NA

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

See Parts C and D in the 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 Allegan 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 potential to emit VOC exceeds 100 tons per year and the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is more than 25 tons per year.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of each criteria pollutant was less than 250 tons per year.

EU-ECOAT at the stationary source is subject to the Standards of Performance for Surface Coating of Metal Furniture promulgated in 40 CFR Part 60, Subparts A and EE.

EU-FOAM, EU-POWDERCOAT, and EU-ECOAT at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Metal Furniture promulgated in 40 CFR Part 63, Subparts A and RRRR.

EU-WBFINISH at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants Standards for Wood Furniture Manufacturing promulgated in 40 CFR Part 63, Subparts A and JJ.

EU-EMERGENCYGEN1 through 6 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants Standards for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

EU-LPPBOILERS, EU-OFFICEBOILERS, EU-PANELS-POWDERCURE, EU-PANELS-DRYOFFOVEN, EU-STEEL-POWDERCOAT, EU-STEEL-ECOATCURE, EU-STEEL-DRYOFFOVEN, EU-STEEL-STEAMBOILER1, EU-STEEL-STEAMBOILER2 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants Standards for Boilers promulgated in 40 CFR Part 63, Subparts A and DDDDD.

The MDEQ, AQD, revised R336.1287 and R336.1290 on December 20, 2016. The revised rules, specifically R336.1287(2)(c) and R 336.1290, have some requirements that are more detailed compared to the earlier versions. FG-RULE287(2)(c) and FG-RULE 290 are flexible group requirement tables created for emission units subject to R 336.1287(2)(c) and R 336.1290, respectively. Emission units installed before December 20, 2016, are allowed to comply with the requirements of Rule 287 and Rule 290 in effect at the time of installation or modification. However, emission units installed or modified after December 20, 2016, must comply with the requirements of the current rules.

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

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

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.

The following table lists all individual PTIs that were incorporated into previous ROPs. The PTIs issued after the effective date of ROP No. MI-ROP-B7186-2012 are identified in Appendix 6 of the ROP.

PTI Number			
302-91	614-85D	625-94	1208-91
420-94	28-80C		

Streamlined/Subsumed Requirements

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the 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	Rule 212(4) Exemption	Rule 201 Exemption
EU-DistributionAMU	9 - 2.5 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)
EU-DistributionRTU	3 - 0.2 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)
EU-PanelsAMU	6 - 2.5 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)
EU-PacklabRTU	1 - 0.08 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-SouthofficeRTU	1 - 0.04 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-Pod1RTU	1 - 0.1 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-TrainingRTU	1 - 0.08 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-DCIAMU	1 - 2.5 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-MockupRTU	1 - 0.4 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-BuildoutRTU	1 - 0.466 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-PowdercoatRTU1	1 - 0.18 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-PowdercoatRTU2	1 - 0.85 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-PowdercoatAMU1	1 - 5.225 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-PowdercoatAMU2	1 - 1.925 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-CafeteriaRTU	1 - 0.85 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-PanelsMaintAMU	1 - 3.75 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-RecycleAMU	2 - 1.125 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)
EU-FitnessRTU	1 - 0.15 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-FacilitymaintRTU	1 - 0.087 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-FacilitymaintAMU	1 - 0.25 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-ToolroomAMU	2 - 0.12 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)
EU-StockroomAMU	1 - 0.25 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-SteelAMU	1 - 3.5 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-PaintcellAMU1	3 - 4.95 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)
EU-PaintcellAMU2	2 - 7.150 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)
EU-SteelqaRTU	1 - 0.087 Million Btu/hr gas fired unit	212(4)(b)	282(b)(1)
EU-ShipAMU	2 - 0.275 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)
EU-LPPAMU1	9 - 2.75 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)
EU-LPPAMU2	4 - 3.672 Million Btu/hr gas fired units	212(4)(b)	282(b)(1)

Draft ROP Terms/Conditions Not Agreed to by Applicant

This draft ROP 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 MDEQ, AQD

The AQD proposes to approve this ROP. 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 USEPA is allowed up to 45 days to review the draft ROP 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 Ms. Mary Douglas, Kalamazoo District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP 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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ROP Number

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March 7, 2018 STAFF REPORT ADDENDUM

MI-ROP-B7186-2018

Purpose

A Staff Report dated January 22, 2018, was developed in order to set forth the applicable requirements and factual basis for the Draft 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:	Mike Reilly, Manufacturing Manager 616-393-1046
AQD Contact:	Matt Deskins, Environmental Quality Analyst 269-567-3542

Summary of Pertinent Comments

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

Changes to the January 22, 2018 Draft ROP

The MDEQ, AQD, did update the Flexible Group Summary Table for the Rule 290 requirements after the public comment ended. The changes that were made were minor and reflected the amendments that were made to the AQD Rule 336.1290 requirements that took effect on December 20, 2016. Therefore, another 30-day public comment period is not deemed necessary.