

HAWORTH

One Haworth Center
Holland, Michigan
49423-9576 USA

phone 616.393.3000
fax 616.393.1570

haworth.com

September 20, 2017

Mr. Matt Deskins
MDEQ-AQD
7953 Adobe Road
Kalamazoo MI 49009



Subject: Haworth Holland (SRN B7186) Violation Notice & Haworth Response

Dear Mr. Deskins:

In response to your letter (excerpts inserted) of September 6, 2017, following is the requested information.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-MANUAL-ADESLN	S.C. VI.2 under the Monitoring/Recordkeeping of this Emission Unit contained in the ROP MI-ROP-B7186-2012a.	See Comment 1 below
FG-RULE290	S.C. VI.1 under the Monitoring/Recordkeeping section of this Flexible Group contained in the ROP MI-ROP-B7186-2012a.	See Comment 2 below
EU-SANDSTRIPPER	S.C. VI.4.a & b under the Monitoring/Recordkeeping section of PTI No. 9-16A.	See Comment 3 below

Comment 1: Although the Facility is maintaining emission records, they did not have them in a 12 month rolling format as required, and even though they have the hours of Facility operation, they were not recording volatile organic compounds emissions in pounds per hour.

Haworth Reply: Attached is a summary table, which provides the required VOC emission results in pounds/hour & tons/year 12-month rolling average, for 2013-2017. The data table will be maintained on a monthly basis from now on.

Comment 2: The Facility did not have up to date monthly emission totals for each EU being operated under Rule 290. Also, for each product potentially being used at each EU, they did not have it broken down with each potential contaminant's ITSL (for non-carcinogenic) and/or IRSL (carcinogenic), and whether it was a controlled emission or uncontrolled, etc.

Haworth Reply: Haworth previously focused on verification of compliance with the Rule 290 VOC emission rate limit [(1000) lbs./month] only. The correction has been completed. Attached are complete (ITSL & IRSL) Rule 290 summaries for EU-FOAM, EU-MISCSOLVENT, EU-ECOAT, EU-WBFINISH, and EU-WBADHESIVES. There are no issues with maintaining compliance with individual compound emission rates for these sources.

Haworth VN Response
09/20/17
Page 2/2

Comment 3: The Facility has not been keeping track of the daily number of batches processed in the sand stripper or 12 month rolling totals of the number processed.

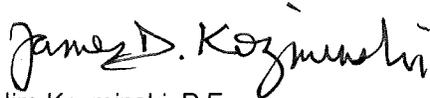
Haworth Reply: The process control system provides PC screen chart records showing the number of batches run and the operating & afterburner temperatures. The unit has been operating under Permit # 9-16A since May 15, 2017. There have not yet been 12 months of operation, in order to calculate the complete rolling average total.

Attached is a summary table which provides the monthly & rolling average batch run counts, as required. The data table will be maintained on a monthly basis from now on.

Refer any questions to me at 616-393-1533.

Sincerely,

HAWORTH, INC.

A handwritten signature in black ink that reads "James D. Kozminski". The signature is written in a cursive style with a large, stylized initial "J".

Jim Kozminski, P.E.
Advanced Environmental Engineer