



STATE OF MICHIGAN
 DEPARTMENT OF
 ENVIRONMENT, GREAT LAKES, AND ENERGY
 KALAMAZOO DISTRICT OFFICE



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

October 14, 2019

Mr. Loc Phan
 Haworth Inc.
 One Haworth Center
 Holland, Michigan 49423

SRN: B7186, Allegan County

Dear Mr. Phan:

VIOLATION NOTICE

On August 14, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Haworth Inc. located at One Haworth Center, Holland, Michigan. The purpose of this inspection was to determine Haworth Inc. compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and

-- the conditions of Renewable Operating Permit (ROP) number MI-ROP-B7186-2018;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-SANDSTRIPPER	Special Condition III.2	Haworth is required to not operate this unit unless the sand bed is preheated to a minimum of 650 degrees Fahrenheit before the parts are loaded into the sand bed for processing. Mr. Kozminski stated during the inspection that parts are loaded into the sand bed before a pre-heating occurs. It was stated to Staff that this is not how the unit was designed to operate. EU-SANDSTRIPPER still has the permit condition and the facility should either apply for a permit modification or operate the unit in a manner that complies with Special Condition III.3
EU-SANDSTRIPPER	Special Condition VI.4	Haworth is required to maintain records of the number of batches of material processed per day. The facility is also required to keep the records on file, in a format acceptable to the AQD District Supervisor. While the facility does keep records of the number of batches using a Java application. Records are shown using graphs in which Haworth has to manually

		<p>select a date then count the number of batches to be reviewed. There is no separate stand-alone recordkeeping system in which the records show a date the unit was used with the corresponding number of batches that were processed that day like they do for the month recordkeeping. Staff does not feel the current recordkeeping system meets a format acceptable to the District Supervisor.</p>
EU-SANDSTRIPPER	Special Condition IV.1	<p>The facility shall not operate EU-SANDSTRIPPER unless the flame combustion zone, secondary afterburner is installed, maintained, and operated in a satisfactory manner. Satisfactory operation is defined in the special condition to include maintaining a minimum temperature of 1,500 degrees Fahrenheit. Staff noted that there were multiple times where the after burner did not maintain the required 1,500 degrees Fahrenheit. Specific times and temperatures that were noted were July 29, 2019 at 7:04 AM Haworth recorded an afterburner temperature of 1,471 degrees Fahrenheit while the unit was operation. Haworth also recorded on July 31, 2019 at 3:41 PM that the afterburner temperature was 1,482 degrees Fahrenheit.</p>
FG-WOOD	Special Condition VI.1	<p>Haworth is required to conduct weekly visible emissions observations, as described in appendix 3. Appendix 3 requires that requires that the facility follow the monitoring procedures, methods, or specifications using steps 1-5 for FG-WOOD. Step 2 states if visible emissions are observed, the maintenance supervisor shall be notified immediately. Haworth Staff noted that there were visible emissions on Baghouse #5 on March 20, 2019 and recorded that maintenance was contacted. Step 3 requires that a determination of needed repairs and/or maintenance shall be performed within 24 hours and recorded. Records not that maintenance determined that the bag needed to be changed and was scheduled</p>

		for May. Step 4 requires that repairs and/or maintenance operations shall be performed within 48 hours of discovery. The log notes that the issue was not corrected and the facility observed visible emissions for 5 additional weeks.
EU-COMPACTFANS	Special Condition VI.1	Haworth is required to conduct and record 1-minute visible emission observations. Staff requested that the visible emission readings from January through July 2019. Staff was provided with records for the months of February, March, May, June, and July for the mineral board compactor. Haworth did not provide visible emission readings for January or April. It appears that the visible emissions were not conducted.
EU-WBADHESIVES	Rule 201	Haworth is claiming to use Rule 290 as an exemption from Rule 201. Rule 290 requires that records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions are maintained in sufficient detail to demonstrate the emissions meet the emission limits outline in Rule 290. Haworth is not tracking actual emissions of the categorized air contaminates just calculating emissions for a particular scenario. Staff does not feel that these records do not meet the requirements of Rule 290.
EU-FOAM	Rule 201	Haworth is claiming to use Rule 290 as an exemption from Rule 201. Rule 290 requires that records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions are maintained in sufficient detail to demonstrate the emissions meet the emission limits outline in Rule 290. Haworth is not tracking actual emissions of the categorized air contaminates just calculating emissions for a particular scenario. Staff does not feel that these records do not meet the requirements of Rule 290.
EU-MISCSOLVENT	Rule 201	Haworth is claiming to use Rule 290 as an exemption from Rule 201. Rule 290 requires that records of material use and

		<p>calculations identifying the quality, nature, and quantity of the air contaminant emissions are maintained in sufficient detail to demonstrate the emissions meet the emission limits outline in Rule 290. Haworth is not tracking actual emissions of the categorized air contaminates just calculating emissions for a particular scenario. Staff does not feel that these records do not meet the requirements of Rule 290.</p>
EU-WBFINISH	Rule 201	<p>Haworth is claiming to use Rule 290 as an exemption from Rule 201. Rule 290 requires that records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions are maintained in sufficient detail to demonstrate the emissions meet the emission limits outline in Rule 290. Haworth is not tracking actual emissions of the categorized air contaminates just calculating emissions for a particular scenario. Staff does not feel that these records do not meet the requirements of Rule 290.</p>
EU-ECOAT	Rule 201	<p>Haworth is claiming to use Rule 290 as an exemption from Rule 201. Rule 290 requires that records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions are maintained in sufficient detail to demonstrate the emissions meet the emission limits outline in Rule 290. Haworth is not tracking actual emissions of the categorized air contaminates just calculating emissions for a particular scenario. Staff does not feel that these records do not meet the requirements of Rule 290.</p>
Non-Production Coating Line	Rule 201	<p>Staff observed a coating line that Mr. Kozminski stated was used as on-site nonproduction painting. Mr. Kozminski stated that mostly aerosols are used, but AQD Staff did observe that some spray guns are located at the station. Mr. Kozminski stated that exemption Rule 287(2)(j) can be utilized, which is for portable equipment that is used for on-site</p>

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		nonproduction painting. Staff disagrees with the use of this exemption because the exemption specifically states that the equipment is portable. Staff observed that this spray booth is equipped with both a stack and fabric filter. Because the spray booth is not movable AQD Staff does not feel the equipment is portable.
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During this inspection, it was noted that Haworth Inc. had commenced operation of an unpermitted process at this facility. The AQD staff advised Haworth Inc. on August 14, 2019, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the EU-WBADHESIVES, EU-FOAM, EU-MISCSOLVENT, EU-WBFINISH, EU-ECOAT, and a Non-Production Coating Line process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 4, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

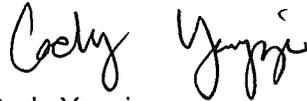
Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Haworth Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Haworth Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Cody Yazzie
Environmental Engineer
Air Quality Division
269-567-3554

Enclosure

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE