

April 18, 2018

Mr. Tyler Salamasick
Department of Environmental Quality
350 Ottawa Avenue, Unit 10
Grand Rapids, MI 49503-2341



**RE: Notice of Violation, March 30, 2018
Grand Rapids Chair Company
Permit to Install No. 112-13**

Dear Mr. Salamasick:

This letter and its attachments serve as the response to your Notice of Violation dated March 30, 2018 for observations made during a February 2, 2018 inspection of Grand Rapids Chair Company (GRC) in Byron Center, MI. Below are responses to the violations identified in the letter.

Recordkeeping/Monitoring for Chair & Table Flexible Groups

GRC has established a system of data collection and reporting for emissions from the chair and table coating lines. A report is generated at the end of each month with the required reporting parameters. A copy of that report is provided as an attachment. Unfortunately, the reports had been controlled by an individual who is no longer employed by the company. Reporting responsibilities and management of air quality compliance have been reassigned and will be more consistently managed in the future.

The reporting methodology was reviewed by the DEQ at the time it was developed and found to be consistent with the requirements of the permit.

GRC uses manufacturer Safety Data Sheets to identify chemical composition and emissions from its coatings. Those are kept electronically, and pertinent data, such as VOC emissions, are transferred to the reporting system. Due to the large quantity of data sheets, they have not been provided as part of this response, but can be provided upon request.

Recordkeeping/Monitoring for Facility Flexible Groups

Due to the very low volume of Hazardous Air Pollutants (HAPs) in chemicals at the facility, GRC does not include those with its monthly reporting. Attached are reports from two of our three coatings suppliers, Accessa and Repcolite, with 2017 HAP emissions of 2100 lbs.

Mr. Tyler Salamasick
Department of Environmental Quality
April 18, 2018
Page 2 of 2

and 472 lbs., respectively. The highest volume coatings from the third supplier, Sherwin Williams, are primarily a non-HAP containing sealer and a topcoat. The topcoat emissions are less than 200 lbs. in 2018. So, net facility-wide aggregate HAP emissions are less than two tons per year.

Due to the low emissions of HAPS and the relatively stable use and content of coatings, GRC made a request to DEQ that it not be included on monthly reports. It was agreed that as long as GRC was able to provide documentation supporting the very low emissions, it was unnecessary to provide actual monthly calculations. If that procedure needs to be revised, please let us know.

If you have any questions or concerns please do not hesitate to contact me at 616-774-0561 or Geoff@grandrapidschair.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoff Miller", written over a light blue horizontal line.

Geoff Miller
President

Enclosures