



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

January 15, 2014

Mr. Thomas Allsberry
Steelcase Inc.
4100 68th Street
Caledonia, Michigan 49316

SRN: N0677, Kent County

Dear Mr. Allsberry:

VIOLATION NOTICE

On December 17, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a Renewable Operating Permit (ROP) Recertification submittal covering ROP Certifications from 2007 through 2012 for the Steelcase, Inc., Wood Furniture Plant located at 4100 68th Street, Caledonia, Michigan. This resubmittal was necessary to comply 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 administrative rules; and the conditions of ROP number MI-ROP-N0677-2008b along with previously issued ROPs, MI-ROP-N0677-2008a, MI-ROP-N0677-2008, and 199600211.

Subsequent to a review of the ROP Recertification, staff confirmed the following:

Process Description	Rule/Permit Condition Violated	Comments
Stain Coating Operation	MI-ROP-N0677-2008b, Table II. Material Limits 2. Water Based Stains 2.80 Pounds of VOC per Gallon (minus water) as Applied.	Exceeded the 2.80 pounds of VOC/gallon (minus water) as applied limit when the original supplier was purchased by another company and the calculated value was revised. Corrected value is 3.75 pounds of VOC/gallon (minus water) as applied.

The ROP Recertification details the exceedance of the pounds of VOC per gallon (minus water) as applied limit. This exceedance began in 2007 when the previous coating vendor was purchased by another manufacturer. According to the submittal, this deviation did not come to light until 2012, which explains the extended duration of the deviation. Though the calculated number exceeded the material limit it did not result in an emission exceedance or additional reported deviations.

Mr. Thomas Allsberry
Steelcase, Inc.
Page 2
January 15, 2014

The Air Quality Division is in receipt of your letter dated December 16, 2013, which outlines an acceptable compliance plan including the dates the violation occurred, an explanation of the causes and duration of the violation, whether the violation is ongoing, and a summary of the actions that have been taken and are proposed to be taken to correct the violation. In addition, please provide by February 5, 2014, in writing, the date by which a complete Permit to Install application will be submitted.

If Steelcase, 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.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Denise Plafcan
Senior Environmental Quality Analyst
Air Quality Division
616-356-0259

cc: Ms. Heidi Hollenbach, DEQ
cc/via email: Mr. Lynn Zimmerman, Steelcase, Inc.
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ