



September 28, 2018

April Lazzaro
DEQ, AQD
350 Ottawa Avenue NW, Unit 10
Grand Rapids MI 49503



Dear Ms. Lazzaro

This letter is to respond to your Notice of Violation issued to Herman Miller, Inc. Zeeland Facility (B6001) dated September 11, 2018.

In the letter you identified Herman Miller, Inc. as being in violation of MI-ROP-B6001-2014a – SOURCE-WIDE Special Condition VI.1 This condition requires the company to maintain a record of individual Hazardous Air Pollutants on a 12-month rolling average.

I would like to inform you that Herman Miller, Inc. has begun and will continue to calculate individual HAPs emitted by our stain line. Finish materials used on the finish line do not identify individual HAPs and therefore, are not included.

The summary table shows that since the first of January 2018 no Individual HAP has been found to exceed 0.00 tons per month. This supports our assertion that individual HAPs are negligible and need not be calculated individually to demonstrate compliance with individual limits.

The information provided here is sufficient to demonstrate that a finding of a violation is not appropriate. It is our hope that the MDEQ will agree and take appropriate action to reverse its finding of noncompliance. In the meantime, Herman Miller, Inc. will continue to calculate monthly HAP emissions and include them in the Site HAP demonstration.

Herman Miller Inc
PO Box 302
Zeeland MI 49464-0302

HermanMiller



The Notice also noted a recordkeeping deficiency of the requirement MI-ROP-B6001-2014a, FGMISC331, Special Condition No. VI.1. This condition serves no purpose. There are no emission limits or operating restrictions which use this in a compliance demonstration. It appears to be an "orphan" condition. Perhaps it was relevant in a draft permit, but not needed in nor removed from the final version. We will ask the MDEQ remove the condition from this table.

Sincerely,

Fred Gordon
Sr. Safety and Sustainability Specialist.

Jason Beecham
Director of Operations, Zeeland Manufacturing

CC
Ms. Jenine Camilleri
Enforcement Unit Supervisor
MDEQ, AQD
P.O. Box 30280
Lansing, MI 48909-7760

Mark Desrochers, Herman Miller, Inc.
Jason Beecham, Herman Miller, Inc.
Beau Seaver, Herman Miller, Inc.
Gabe Wing, Herman Miller, Inc.

MDEQ GR District 7014 0510 0002 0914 4871