

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY





September 11, 2018

Mr. Jason Beecham Herman Miller, Inc. 855 East Main Avenue Zeeland, Michigan 49464

Dear Mr. Beecham:

SRN: B6001, Ottawa County

VIOLATION NOTICE

On August 14, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Herman Miller, Inc. located at 855 East Main Avenue, Zeeland, Michigan. The purpose of this inspection was to determine Herman Miller, Inc.'s 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-B6001-2014a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
SOURCE-WIDE, Individual Hazardous Air	MI-ROP-B6001-2014a,	Failure to maintain record of individual Hazardous
Pollutant records	Section 1 - SOURCE-WIDE, Special Condition VI.1	Air Pollutants on a 12-
4		month rolling basis.

During an August 11, 2016 inspection, AQD staff noted deficiencies in the recordkeeping and stated in the inspection report that "the Source-Wide records need to be updated to include each individual coating Hazardous Air Pollutant, even though they are less than 20 pounds each." This has not been done and is a violation of MI-ROP-B6001-2014a, Section 1 - SOURCE-WIDE, Special Condition VI.1

Additionally, Herman Miller Inc. is not correctly recording hours of operation for each emission unit control device while exhausting to the outdoor air as required in MI-ROP-B6001-2014a, FGMISC331, Special Condition No. VI.1. This deficiency needs to be corrected.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 2, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Herman Miller, 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 and for the cooperation that was extended to me during my inspection of Herman Miller, Inc. 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,

Senior Environmental Quality Analyst

Air Quality Division

616-558-1092

Ápril Lazzaro

cc: Ms. Mary Ann Dolehanty, DEQ

Mr. Craig Fitzner, DEQ

Mr. Christopher Ethridge, DEQ

Ms. Jenine Camilleri, DEQ

Ms. Heidi Hollenbach, DEQ