

HAWORTH

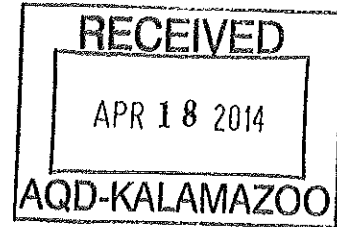
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April 14, 2014

Mr. Dale Turton
MDEQ-AQD Kalamazoo District
7953 Adobe Road
Kalamazoo, MI 49009-5025



Dear Mr. Turton:

Subject: EUSPRAYBOOTH Violation Notice; Daily E-Coat VOC; SRN: B7186

This is Haworth's written reply to the Violation Notice. The reported exceedances of the daily VOC emission limit were caused primarily by the use of small amounts of an additive, injected into the E-Coat tank to maintain paint performance. There were also incidents of the daily ratio of paste to resin being a bit too low, causing the higher emission rates.

The attached 2014 data, accounting for (54) days' worth of E-Coat production, show that the number of exceedances has been greatly reduced. However, we have no reason to expect that we will ever get to zero daily exceedances. It is worth noting that the average VOC emission rate, over this recent period, was just (7) lbs. per day.

The Violation Notice in-correctly called out Haworth violations of the applicable NSPS regulation copied below. Haworth's air permit requires *daily* compliance with a limit of (0.80) lbs. VOC per gallon of applied coating solids. The NSPS regulation requires *monthly* average emissions of less than (7.5) lbs. VOC per gallon of applied solids. Haworth did not come close to exceeding the NSPS limit.

§60.312 Standard for volatile organic compounds (VOC).


(a) On and after the date on which the initial performance test required to be conducted by §60.8(a) is completed, no owner or operator subject to the provisions of this subpart shall cause the discharge into the atmosphere of VOC emissions from any metal furniture surface coating operation in excess of 0.90 kilogram of VOC per liter of coating solids applied.

It has really never made any sense for the E-Coat process to be regulated on a daily basis. The paste, resin, and additive are periodically added to the large E-Coat dip tank. As a practical matter, what is added to the tank one day may remain in the tank for a number of days following. There should not be all that much regulatory attention required for a (7) lbs. VOC/day emission source.

Refer any questions to me at 616-393-1533.

Sincerely,

HAWORTH, INC.


Jim Kozminski, P.E.
Advanced Environmental Engineer