

Jim Kozminski

From: Jim Kozminski
Sent: Friday, November 15, 2019 12:12 PM
To: Yazzie, Cody (EGLE)
Cc: laner@michigan.gov; CamilleriJ@michigan.gov
Subject: RE: August 14, 2019 Inspection Report
Attachments: Haworth Holland Response to AQD Violation Notice 111519.pdf

This is Haworth's written response. Hard copies were sent out via US Mail.

The attachment provides a summary table & associated attachments regarding our responses to the items included in the Violation Notice dated 10/14/19.

None of the violations are ongoing. The dates of the violations, where applicable, were identified in the Violation Notice.

Causes include:

- My errors in stating that sand stripper preheating was not done, and incorrectly citing Rule 287 2 (j), instead of Rule 287 (c), for the maintenance spraybooth.
- Also previously failed to emphasize Appendix 3 monitoring requirements for the dust collectors.

The EUSANDSTRIPPER has not been used since September 30. The lift & crane system, used to place baskets of paint racks into the tank, is in need of repair.
-At the latest, the plant will complete permanent decommissioning, and permanently end the use of the unit in January, 2020.

Jim Kozminski

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-----Original Message-----

From: Jim Kozminski <Jim.Kozminski@Haworth.com>



MACE
Cody

Sent: Wednesday, October 23, 2019 11:21 AM
To: Yazzie, Cody (EGLE) <YazzieC@michigan.gov>
Subject: Re: August 14, 2019 Inspection Report

I appreciate the deadline extension & the clarifications.

FYI- The EU-SANDSTRIPPER unit has not been operated in a number of weeks. On my instruction, Maintenance is locking out the unit to prevent any further use in the near term. The basket conveyor system needs repairs, and the plant is holding on any expenditure of resources for this, awaiting the final management decision on the timing for permanent decommissioning. The accounting aspects of this decision are under review, coinciding with 2020 budget planning underway.

Also- I am exploring the use of the correct permit exemption to be applied to the non-production maintenance spraybooth. Naturally, coating usage in the unit is very low & intermittent.

From: Yazzie, Cody (EGLE) <YazzieC@michigan.gov>
Sent: Wednesday, October 23, 2019 9:43 AM
To: Jim Kozminski
Subject: RE: August 14, 2019 Inspection Report

Hello Jim,

When a violation notice is sent it is AQD's policy to send a hard copy of the inspection report with the violation notice. There was some miscommunication on getting the letter sent out and for that I apologize.

When a facility is claiming an exemption and the facility is not meeting the requirements of the exemption or it has been determined that an exemption does not apply then the cited rule violation is Rule 201. This would be the case for the non-production spray booth. During the inspection I do recall questioning the aerosols which caused us to investigate the paint booth and find spray guns then questioning why it wasn't 287(c) which brought up Rule 287(j) the portable equipment used for on-site non production painting. During the inspection I do not believe I stated whether I agreed or disagreed with the use of the exemption.

During the inspection I recall that the violations were discussed as violations and how they were not complying with the ROP. I was taking these conversations as my notice to Haworth that the violation notice would be sent as these are typically what are sent after violations are identified during an inspection. I am sorry for the miscommunication I should have been more direct about the violation notice.

I am okay with extending the response deadline to November 15, 2019.

Let me know if you have any further questions.

Best Regards,

Haworth Holland ROP Compliance Findings Response 11/15/19

Emission Unit	Compliance Issues	Corrective Actions/Notes
Sand Stripper	1-Not preheating to 650 °F before cycle begins 2-Manual batch cycle count (daily) from database 3-Afterburner temperature control \geq 1500 °F	1-Kozminski was mistaken; unit is preheated to 650 °F before 2-Daily cycle counts completed since August; max days observ 3- Setpoint changed to 1600 °F; unit not used since September
LPP Wood Dust Collectors	Baghouse #5 records (March 2019) indicate ~5 week response time for bag replacement Permit requires 48 hours response	Implemented Appendix 3 monitoring & response program (see below) -detailed work instructions emphasized with plant -no visible emissions noted May 2019 through November 2019 (YTD)
Compactor Fans	Monthly visible emission monitoring Missing January & April 2019	No missing months since April. Re-emphasized permit conformance with responsible personnel.
Rule 290 Sources	WB Adhesives, Foam, Miscellaneous Solvent Lacking monthly records of categorized air contaminants (per ITSL's & IRSL's if any)	For these three R290 sources: Monthly 2019 VOC & TACs data tabulated & attached See attached example monthly records for YTD highest usage rate months
Rule 290 WB Wood Finishing	Lacking monthly records of categorized air contaminants (per ITSL's & IRSL's if any)	Refer to attached summary of 2019 monthly VOC emission rates Categorized air contaminants tabulated See attached example monthly record for YTD highest usage rate month
Rule 290 ECoat	Lacking monthly records of categorized air contaminants (per ITSL's & IRSL's if any)	Refer to attached summary of 2019 monthly VOC emission rates Categorized air contaminants tabulated See attached example monthly record for YTD highest usage rate month
Maintenance Paint Spraybooth	Cited incorrect permit exemption for this low usage non-production spraybooth	Correct exemption is Rule 287 (c) Implemented monthly paint usage tracking system; usage < (2) gals/mo. Will verify monthly conformance to Rule 287 (c) < 200 gallons

Appendix 3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EU-COMPACTFANS, FG-WOOD, and FGRULE290:

1. Visible emissions shall be recorded as "observed" or "not observed."
2. If visible emissions are observed, the maintenance supervisor shall be notified immediately.
3. A determination of needed repairs and/or maintenance shall be made within 24 hours and recorded.
4. Repair and/or maintenance operations shall be performed within 48 hours of discovery.
5. Routine maintenance shall be performed according to the manufacturer's recommendations.