



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYHER  
DIRECTOR

September 6, 2017

Mr. Jim Kozminski  
Haworth, Inc.  
One Haworth Center  
Holland, Michigan 49423

SRN: B7186, Allegan County

Dear Mr. Kozminski:

**VIOLATION NOTICE**

On August 18, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Haworth, Inc. (Facility), located at One Haworth Center, Holland, Michigan. The purpose of this inspection was to determine the Facility'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; the conditions of Renewable Operating Permit (ROP) MI-ROP-B7186-2012a; and the conditions of Permit to Install (PTI) No. 9-16A.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-MANUAL-ADESLN	S.C. VI.2 under the Monitoring/Recordkeeping of this Emission Unit contained in the ROP MI-ROP-B7186-2012a.	See Comment 1 below
FG-RULE290	S.C. VI.1 under the Monitoring/Recordkeeping section of this Flexible Group contained in the ROP MI-ROP-B7186-2012a.	See Comment 2 below
EU-SANDSTRIPPER	S.C. VI.4.a & b under the Monitoring/Recordkeeping section of PTI No. 9-16A.	See Comment 3 below

Comment 1: Although the Facility is maintaining emission records, they did not have them in a 12 month rolling format as required, and even though they have the hours of Facility operation, they were not recording volatile organic compounds emissions in pounds per hour.

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Comment 2: The Facility did not have up to date monthly emission totals for each EU being operated under Rule 290. Also, for each product potentially being used at each EU, they did not have it broken down with each potential contaminant's ITSL (for non-carcinogenic) and/or IRSL (carcinogenic), and whether it was a controlled emission or uncontrolled, etc.

Comment 3: The Facility has not been keeping track of the daily number of batches processed in the sand stripper or 12 month rolling totals of the number processed.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 27, 2017. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Facility 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 violations cited above and for the cooperation that was extended to me during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Matt Deskins  
Environmental Quality Analyst  
Air Quality Division  
269-567-3542

MD:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Mary Douglas, DEQ