



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 6, 2021

Mr. David McLenithan
Steelcase Inc., Kentwood Complex
P.O. Box 1967
Grand Rapids, Michigan 49501-1967

SRN: N0677, Kent County

Dear Mr. McLenithan:

VIOLATION NOTICE

On June 28, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Steelcase Inc., Kentwood Complex located at 5353 Broadmoor Avenue SE, Kentwood, Michigan. The purpose of this inspection was to determine Steelcase Inc., Kentwood Complex'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-N0677-2020.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUWOOD-DC-7	MI-ROP-N0677-2020, Section 4 - Wood Furniture FGWOOD-WOODWORKING, Special Condition III.2	Failure to properly install and operate the baghouse collector.
EUWOOD-DC-7	Rule 910	Failure to properly install and operate the baghouse collector.
EUWOOD-DC-7	MI-ROP-N0677-2020, Section 4 - Wood Furniture, FGWOOD-WOODWORKING, Special Condition VI.5 and 40 CFR 64.6(c)(2)	Failure to maintain a pressure drop between the indicator range of 1-5" water column (WC) on a continuous basis.

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On June 28, 2021, AQD staff observed operation of EUWOOD-DC-7 with a pressure drop value of 0.1" WC, which indicates improper operation. A detailed evaluation of the inspection of EUWOOD-DC-7 was provided to the AQD on July 14, 2021. The inspection found that the arm that rotates across the top of each section of the baghouse was not moving because the chain had fallen off the drive. The information provided in the evaluation indicated the issue with the baghouse pressure drop has been occurring since 2018.

This constitutes a violation of MI-ROP-N0677-2020 and Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. It is also a violation of the requirements of the ROP's Compliance Assurance Monitoring (CAM) pursuant to 40 CFR Part 64.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 27, 2021 (which coincides with 21 calendar days from the date of this letter). 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.

While the documentation provided to the AQD on July 14, 2021, includes a majority of details related to the incident and satisfies the requirements identified in the previous paragraph, additional information is requested by September 16, 2021:

- Evaluation of the current acceptable pressure drop range of 1-5" WC to determine if it is appropriate, based on the manufacturer's suggested range which is listed as 2-6" WC.
- Submittal of an updated Preventative Maintenance Plan to align with the requirements of a Preventative Maintenance and Malfunction Abatement Plan as detailed in Rule 336.1911.

Please submit the written response to EGLE, 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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Steelcase Inc., Kentwood Complex 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Steelcase Inc., Kentwood Complex. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Mr. Lynn Zimmermerman, Steelcase Inc., Kentwood Complex
Ms. Karen Andres, Steelcase Inc., Kentwood Complex
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE