

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Haworth, Inc. - Big Rapids Components-steel & wood	SRN : N5569
Location : 300 N Bronson Big Rapids Industrial Park	District : Grand Rapids
	County : MECOSTA
City : BIG RAPIDS State: MI Zip Code : 49307	Compliance Status : Compliance
Source Class : MAJOR	Staff : Chris Robinson
FCE Begin Date : 9/17/2017	FCE Completion Date : 9/17/2018
Comments : Hayworth appears to be in compliance with MI-ROP-N5569-2014. See Activity Report No. CA_N556945568.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/03/2018	MACT (Part 63)	Compliance	Semi-annual ROP (MI-ROP-N5569-2014) Report Certification pursuant to 40 CFR Part 63 Subpart JJ (Wood NESAH) received 7/30/2018. This federal standard establishes a maximum VHAP limit of 1.0 lb/lb solid for each stain applied and 0.8 lb/lb solid for washcoats, sealers, topcoats, basecoats and enamels applied (63.804(a)(2)(i)). The facility has opted to comply with this standard by demonstrating the use of compliant materials as allowed by 63.804(a)(2). The data shows that Haworth, Inc. is in compliance by utilizing water-based coatings and finishes with a HAP content of ~0.0.
07/31/2018	Scheduled Inspection	Compliance	FY '18 on-site inspection to determine the facility's compliance status with ROP No. MI-ROP-N5569-2014.
05/21/2018	CAM Excursions/Exceedances	Compliance	No excursions or exceedances reported.
05/21/2018	CAM monitor downtime	Compliance	No monitor downtime reported.

Activity Date	Activity Type	Compliance Status	Comments
04/06/2018	MAERS	Compliance	ROP Certification form for MAERS received 3/16/18 (Postmarked 3-12-18). The facility used Mass Balance calculations with supporting documentation. No changes made to database as submitted. (CRobinson, 4/6/2018)
03/26/2018	ROP Annual Cert	Compliance	Annual Compliance Certification, pursuant to MI-ROP-N5569-2014, covering the period of 1/1/2017 through 12/31/2017. Initially received 3/16/2018 (postmarked 3/12/2018) complete and properly certified noting two CAM excursions for missing dust collector records. CR Contacted Mr. Jim Kozminski on 3/26/2018 and Mr. Kozminski determined that the excursions are a deviation of ROP Flex Group FGDUSTCOLLS Special Condition VI.1 and not CAM related. Revised forms received on 4/10/2018.
03/26/2018	ROP SEMI 2 CERT	Compliance	Semi-Annual Report Certification, pursuant to MI-ROP-N5569-2014, covering the period of 7/1/2017 through 12/31/2017. Initially received 3/16/2018 (postmarked 3/12/2018) complete and properly certified noting two CAM excursions for missing dust collector records. CR Contacted Mr. Jim Kozminski on 3/26/2018 and Mr. Kozminski determined that the excursions are a deviation of ROP Flex Group FGDUSTCOLLS Special Condition VI.1 and not CAM related. Revised forms received on 4/10/2018.
03/26/2018	NSPS (Part 60)	Compliance	NSPS Subpart EE certification report, pursuant to MI-ROP-N5569-2014, covering the period of 7/1/2017 through 12/31/2017. Received 3/16/2018 (postmarked 3/12/2018) complete and properly certified. Haworth provided a compliance statement indicating that the facility is in compliance with the VOC emission limit of 7.5lbs VOC/gallon of applied solids for the BRC E-coat paint system. The actual emissions were reported as < 0.60lbs VOC/gallon of applied solids.

Activity Date	Activity Type	Compliance Status	Comments
03/09/2018	MACT (Part 63)	Compliance	<p>ROP (MI-ROP-N5569-2014) Report Certification pursuant to 40 CFR Part 63 Subpart JJ (the Wood NESAHF) received 1/29/2018. This federal standard establishes a maximum VHAP limit of 1.0 lb/lb solid for each stain applied (63.804(a)(2)(i)). The facility has opted to comply with this standard by demonstrating the use of compliant materials as allowed by 63.804(a)(2). Typically, water-based coatings containing ~0% HAPS are used. However, this Certification Report noted that HAP containing stains were supplied and used in error from July-October 2017. VHAP emissions were initially not provided, therefore AQD requested an amended certification, which was received on 3/9/2018. VHAP emissions for the six (6) HAP containing stains were calculated. The maximum VHAP was 0.46 lb/lb solid, as applied, which is less than the 1.0 lb/lb solid limit specified in the ROP and 63.804(a)(2)(i).</p>
10/04/2017	CAM Excursions/Exceedances	Compliance	<p>As required by ROP No. MI-ROP-N5569-2014, a Semi-Annual Compliance Report was submitted to the AQD for FGDUSTCOLLSCAMPLAN. The reporting time period was from 01/01/2017 through 06/30/2017. One deviation was identified during that time period and was monitoring log entries for the weeks of 05/17, 06/07, 06/21, and 06/28 not being completed due to the primary DC inspector being on vacation and a back up inspection not being used. The company plans on using a back-up inspector from now on. After further review, no violation will be issued and this will be discussed further in the 2018 Fiscal Year inspection. The report was received on time and deemed complete. (AShaffer 10/04/2017)</p>

Activity Date	Activity Type	Compliance Status	Comments
10/03/2017	CAM monitor downtime	Compliance	As required by ROP No. MI-ROP-N5569-2014, a Semi-Annual Compliance Report was submitted to the AQD for FGDUSTCOLLSCAMPLAN. The reporting time period was from 01/01/2017 through 06/30/2017. One deviation was identified during that time period and was monitoring log entries for the weeks of 05/17, 06/07, 06/21, and 06/28 not being completed due to the primary DC inspector being on vacation and a back up inspection not being used. The company plans on using a back-up inspector from now on. After further review, no violation will be issued and this will be discussed further in the 2018 Fiscal Year inspection. The report was received on time and deemed complete. (AShaffer 10/04/2017)
10/03/2017	ROP Semi 1 Cert	Compliance	As required by ROP No. MI-ROP-N5569-2014, a Semi-Annual Compliance Report was submitted to the AQD. The reporting time period was from 01/01/2017 through 06/30/2011. One deviation was identified during this time period. The primary DC inspection was on vacation and the plant did not make arrangements for a back-up inspector to complete logsheet entries. The deviation occurred on the weeks of 05/17, 06/06, 06/21 and 06/28. Haworth, Inc. plans to utilize a back-up inspector from now on. After further review, no violation will be issued and this will be discussed further in the 2018 Fiscal Year inspection. The report was received on time, properly certified, and deemed complete. (AShaffer 10/04/2017)
10/03/2017	NSPS (Part 60)	Compliance	As required by 40 CFR Part 60 Subpart EE, a Semi-Annual Compliance Report for FGNSPSEE was submitted to the AQD. The reporting time period was from 01/01/17 through 06/30/17. No exceedances were identified. The report was received on time and deemed complete. (AShaffer 10/04/17)

Name: 

Date: 9/17/2018

Supervisor: 