



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

July 19, 2016

Ms. Brandy Wright
Haworth Inc. - Big Rapids Components
300 North Bronson
Big Rapids, Michigan 49307

SRN: N5569, Mecosta County

Dear Ms. Wright:

VIOLATION NOTICE

On July 13, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Haworth Inc. - Big Rapids Components (Haworth) located at 300 North Bronson, Big Rapids, Michigan. The inspection included both Metal and Wood operations. The purpose of this inspection was to determine Haworth'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-N5569-2014.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Wood Plant - FGDUSTCOLLSCAMPLAN DC-2	ROP No. MI-ROP-N5569-2014, FGDUSTCOLLSCAMPLAN, Special Conditions VI.1 and VI.5; 40 CFR 64.6(c)(1); 40 CFR 64.6(c)(3); 40 CFR 64.7(c)	Compliance Assurance Monitoring (CAM) Plan requires continuous monitoring of baghouse leak detection; the DC-2 dust leak detector has worked only two weeks in 2016.
Wood Plant - FGDUSTCOLLSCAMPLAN DC-2	ROP No. MI-ROP-N5569-2014, FGDUSTCOLLSCAMPLAN, Special Condition VI.6; 40 CFR 64.7(b)	Requires timely maintenance of the leak detection system.

During this inspection, requested records and on-site observation of the Baghouse Leak Detection System for Dust Collector DC-2 indicated prolonged unavailability of the system since the beginning of 2016. Only two weekly records for 2016 indicated availability of this monitoring system which is required by the federal Compliance Assurance Monitoring program, as incorporated into ROP No. MI-ROP-N5569-2014. Unavailability of a the monitoring system for this prolonged period is a violation of FGDUSTCOLLSCAMPLAN Special Conditions VI.1, VI.5 and VI.6. These collectively require continuous operation of the leak detection system and proper maintenance to keep it operable/available.

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Also recall that during the inspection, I observed intermittent visible emissions from what is believed to be the Main Stain booth at the Wood Plant. Per our discussions, Rule 910, requires that an air-cleaning device (such as overspray filters) shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. It was not practical to observe filter condition or placement while staining operations were ongoing, but as discussed, unless filters are in good repair and properly installed, overspray may not be fully captured. While the filters are reportedly routinely replaced, if they are not properly positioned, discharge of overspray can occur. At the inspection's Exit Interview, I had requested a facility review of these filters in particular and assessment of booth operation and maintenance practices in general to assure that overspray is satisfactorily captured.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 9, 2016 (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. Please incorporate your findings and actions relative to the overspray filters into this same response.

If Haworth 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 Haworth Inc. - Big Rapids Components. 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,



Stephen J. Lachance
Environmental Quality Specialist
Air Quality Division
616-356-0239

cc: Ms. April Lazzaro, DEQ
cc/via e-mail: Mr. Jim Kozminski, Haworth
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ