



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 11 2012

REPLY TO THE ATTENTION OF:

Mary Douglas
Kalamazoo District Supervisor
Michigan Department of Environmental Quality
7953 Adobe Road
Kalamazoo, Michigan 49009

Dear Ms. Douglas:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for Haworth, Incorporated, State Registration Number B7186, located in Holland, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. The Staff Report includes a streamlined/subsumed requirement analysis for EU-SPRAYBOOTH, and generically states that two volatile organic compound Permit to Install limits are equivalent to the emission limit required by 40 CFR 60.312(a). The stringency analysis is incomplete because 1) it does not identify the specific emissions limit required by the New Source Performance Standard, and 2) it does not specifically compare the different limits. The Staff Report should include a complete stringency comparison and analysis.

In addition, the Staff Report does not provide any analysis indicating that the compliance, monitoring, reporting, and recordkeeping requirements of Subpart EE, Standards of Performance for Surface Coating of Metal Furniture, are also being streamlined. The permit's emission unit conditions for EU-SPRAYBOOTH should include all the applicable performance tests, test methods, compliance provisions, monitoring, reporting, and recordkeeping requirements required by Subpart EE.

2. Numerous monitoring/testing method references in the emission limits tables throughout the permit refer to General Condition 13 instead of identifying the specific methods for determining compliance with the emission limits. General Condition 13 provides that the Michigan Department of Environmental Quality (MDEQ) may require performance tests. It does not address any specific monitoring requirements required by the underlying applicable requirements, nor does it address the periodic monitoring or sufficiency monitoring requirements of 40 CFR 70.6(a)(3)(B) and 70.6(c)(1), respectively. Please ensure that the permit

accurately references the associated monitoring/testing methods for each of these limits, and that the permit includes adequate monitoring, recordkeeping, and reporting as required by the underlying applicable requirements and the Part 70 regulations.

3. The Staff Report lists numerous gas fired heaters that are described as exempt devices under Rule 212(4) and Rule 282(b)(1). Are there any cumulative applicability impacts of these devices that should be addressed in the Staff Report, particularly with respect to the source's major source status for carbon monoxide, nitrogen oxides, and/or greenhouse gas emissions?

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please contact me or Beth Valenziano, of my staff, at (312) 886-2703.

Sincerely,



Genevieve Damico
Chief, Air Permits Section

cc: Teresa Seidel, MDEQ Field Operations Supervisor

Dale Turton, MDEQ Kalamazoo District Office