

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

A582737598

<b>FACILITY:</b> HARBOR INDUSTRIES INC		<b>SRN / ID:</b> A5827
<b>LOCATION:</b> 14130 172ND ST, GRAND HAVEN		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> GRAND HAVEN		<b>COUNTY:</b> OTTAWA
<b>CONTACT:</b> Rick Elzinga , Maintenance Lead		<b>ACTIVITY DATE:</b> 10/26/2016
<b>STAFF:</b> Kaitlyn DeVries	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> The purpose of this inspection was to determine compliance with all applicable air quality rules and regulations.		
<b>RESOLVED COMPLAINTS:</b>		

On Wednesday October 26, 2016 AQD staff Kaitlyn DeVries (KD) and Chris Robinson (CR) conducted an unannounced, scheduled inspection of Harbor Industries Inc., located at 14130 172<sup>nd</sup> St. Grand Haven, Michigan. The purpose of this inspection was to determine compliance with all applicable air quality rules and regulations.

Staff met with Mr. Rick Elzinga, Maintenance Lead, who escorted them around the facility. Later, staff met with Mr. Eric Burgtorf, sample manager, who escorted staff through the coating and woodworking operations.

### Facility Description

Harbor Industries Inc., (Harbor Industries) designs and manufactures merchandise fixtures and displays for various industries. Most of the production is done at their Charlevoix location, and the Grand Haven location is primarily for research and design; they do, however, do some production on site. The facility typically operates one (1) shift per day, five (5) days per week.

### Regulatory Analysis

The facility does not currently have any active permits. Historically, there were several processes that were permitted, but all of the permits have subsequently been voided due to the equipment being removed, or the facility choosing to utilize a Rule 201 permitting exemption.

### Compliance Evaluation

Harbor Industries has seven (7) woodworking stations that include cutting, sanding, and edging. All of these stations are exhausted to a 5,100 CFM baghouse that also goes through a cyclone before shakeout into the hopper. The air is then re-circulated back into the facility. There are also three (3) floor sweeps that are exhausted to the dust collector too. These processes are exempt from Rule 201 permitting under Rule 285 (I)(vi). Mr. Elzinga went on to explain that Harbor Industries is planning on replacing the bags in the baghouse soon, but do not yet have a date set for this maintenance.

There are also two (2) paint booths that are used for painting parts, and applying adhesive. Both booths were equipped with a fabric filter. Harbor Industries was in the process of changing out the filters for the booths when staff arrived. KD noted that she was glad that Harbor Industries was changing out the filters as they appeared spent. Mr. Burgtorf explained that the filters are not changed on a set schedule, but rather are changed on an as needed basis due to the variability of the coating operations. KD also noted that there were gaps in the adhesive filter booths. KD discussed the importance of ensuring that the filters were properly installed to both Mr. Elzinga and Mr. Burgtorf. In order to utilize the Rule 287(c) permitting exemption for the coating operations, the monthly usage needs to be below 200 gallons per month. KD asked for appropriate records, and Mr. Burgtorf stated they only had purchase records for the coating and asked if that would suffice as they buy the coating when they need it, and don't keep that much inventory. KD explained that they really should be tracking the usage of the coatings rather than relying on purchase records, but she would take these records this time. At the time of this report, KD sent Mr. Burgtorf information on how to properly track coatings to utilize the Rule 287 (c) permit exemption. Based on the last year of purchase records, Harbor Industries is well below the 200 gallon limit, as the largest quantity purchased was 17 gallons in one month. The thinner that is used, also has low usage, as one 53 gallon drum is purchased per year, and lasts the entire year. Purchase records are attached.

There are also several machining stations in the main building and are exhausted to the in-plant environment. Per Mr. Elzinga, this equipment is used occasionally for maintenance. This equipment is exempt from Rule 201 permitting under Rule 285 (I)(vi).

Harbor Industries has one (1) parts cleaner located by the machining equipment, but was completely empty and being used for storage at the time of the inspection.

Additionally, Harbor Industries has one (1) Cummins Onon Gen Set 1.8 HP natural gas only emergency generator. This engine exempt from Rule 201 permitting under Rule 282 (b)(i), but is subject to the new source performance standard (NSPS) 40 CFR Part 60 Subpart JJJJ. Since this generator is less than 100 HP, the only requirements are to keep maintenance records to demonstrate compliance. Per Mr. Elzinga, Harbor Industries does regular maintenance checks on the unit to ensure that it is properly running.

The building to the north contains a plastic extrusion line. Per Mr. Elzinga, this process is relatively new to their manufacturing processes, and hope that it will increase production. This process is exempt from Rule 201 permitting under Rule 286(a).

**Compliance Determination**

Based on the observations made during the inspection and a subsequent review of the records, it appears as if Harbor Industries, Inc. is in compliance with all applicable air quality rules and regulations.

NAME Karl M. Davis DATE 11/14/16 SUPERVISOR [Signature]