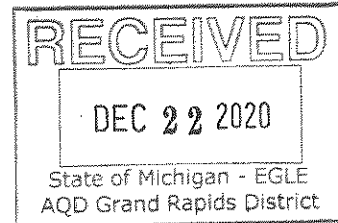




ESTABLISHED IN 1937



December 22, 2020

Mr. Adam Shaffer  
EGLE – Air Quality Division  
Grand Rapids District Office  
350 Ottawa Avenue, NW Unit 10  
Grand Rapids, MI 49503

**re: Harlo Products Corporation (SRN B8887)  
Violation Notice of December 16<sup>th</sup>**

Dear Mr. Shaffer,

Harlo Products Corporation (Harlo) is in receipt of your Violation Notice of December 16<sup>th</sup>, 2020, alleging a violation of special condition 3.2 of PTI No. 141-04A.

You have requested that actions be initiated to correct the alleged violations and have also requested a written response by January 6, 2021. You have indicated that the written response should include the dates that the violations occurred, an explanation of the cause and duration of the violation, whether the violation is ongoing, a summary of the actions that have been taken and are proposed to be taken to correct the violation and that dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

*PTI No. 141-04A, FGFACILITY, Special Condition (SC) 3.2: Failure to use manufacturer's formulation data to determine HAP content*

Harlo currently uses "Environmental Data Sheets" as "manufacturer's formulation data" for all coatings used at the facility. From spring 2011 to summer 2020, we had been using coatings from a different supplier and had received safety data sheets (SDSs) for this information as the SDS reported "VOC EPA METHOD 24" data. Harlo is no longer using these materials and they are no longer at the facility which appears to be the source of the violation notice.

During the previous inspection in 2016, it appears that MDEQ asked for the use of "manufacturer's formulation data" and not what the facility was currently using, which was "material safety data sheets." At the time, Harlo upgraded to "safety data sheets" and believed that this was what MDEQ was requesting.

Unfortunately, it was not clear to Harlo what constituted "manufacturer's formulation data" as we could not find any EGLE formal guidance on this issue. We did find multiple references to "MSDSs" in EGLE guidance documents, including the MAERS User Guide and the Emission Calculation Fact Sheet for Coating Operations. Regardless, Harlo is now exclusively using "Environmental Data Sheets" for "manufacturer's formulation data" and will continue to do so



moving forward. We will consult with EGLE if we are unable to acquire a document specifically entitled "Environmental Data Sheet."

I hope that the information provided is acceptable but please let me know if you have any questions and thank you for your time and cooperation in this matter.

Sincerely,

A handwritten signature in black ink, which appears to read "Mike Birkmeier", is written over the word "Sincerely,".

Mike Birkmeier  
Chief Operating Officer

cc: Ms. Janine Camilleri  
Enforcement Unit Supervisor  
EGLE – Air Quality Division  
P.O. Box 30260  
Lansing, MI 48909-7760