

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

B888737504

FACILITY: Harlo Corporation		SRN / ID: B8887
LOCATION: 4210 Ferry Street, SW, GRANDVILLE		DISTRICT: Grand Rapids
CITY: GRANDVILLE		COUNTY: KENT
CONTACT: Jim Courtright, Facilities Manager		ACTIVITY DATE: 11/01/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Jim Courtright, Facilities Manager and Mike Birkmeier, Chief Operations Officer.

FACILITY DESCRIPTION

Harlo Products Corporation is a facility that contains three business units that operate pursuant to Opt-out Permit to Install No. 141-04A. The business units include AMP, Harlo Corporation and Harlo Products. The AMP unit conducts metal working operations that have been presented as exempt from permitting. The Harlo Corporation unit includes the Control Panel production and two paint booths that are described in the permit as exempt pursuant to Rule 287(c). The Harlo Products unit includes the Material Handling production and two new source review permitted paint booths. This area produces rough terrain fork trucks for various industries including nut farming.

Each of the three areas utilizes a wash bay and adjacent Hotsy, which is a small heated parts washer. This parts washer does utilize a mild acid, but it is not externally vented. The vent that is present is to vent the combustion gasses. These appear exempt per Rule 285(r)(iv).

COMPLIANCE EVALUATION

EU-MatHandling#1 and EU-MatHandling#2

These are listed as separate emission units (EU) that each covers one metal parts paint spray booth which is limited to 2000 pounds per month and 10.0 tons per year based on a 12-month rolling time period. However, since the EU's are identical in the permit, they are combined for purposes of this report. The emission limits are established to keep the metal parts coating below the limits of the Part 6 coating VOC content limits. The highest emission rate on a monthly basis was 795.1 pounds during January 2016. The 12-month rolling total VOC emission rate is reported at 2.94 tons. During the facility inspection, recommendations were made in regard to filter placement in the booths. This could be improved for better particulate capture. Changes were made immediately. Mr. Courtright confirmed the use of HVLP guns in the booths. The facility had asked in 2008 to utilize formulation data to calculate emissions, but AQD had not formally responded as required. A letter is being written to Harlo Products Corporation to approve the use of formulation data. A discussion ensued with regard to the difference between a Safety Data Sheet (SDS) and Formulation Data. It was emphasized that Formulation Data must be used. All calculations were up-to-date and provided immediately. Required information include recording gallons used and VOC content of each material used. These records are being kept and are attached. No obvious stack changes have occurred since the last inspection.

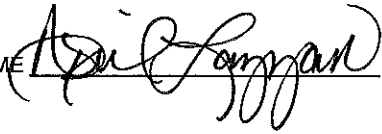
FGFACILITY

The Control Panel production area was also observed, and recommendations were made regarding filter placement in the booths. Records demonstrating compliance with the 200 gallons per month limitation per Rule 287(c) were provided and are attached. September 2016 reported coating usage was 25 gallons.

The FGFACILITY flexible group limits each individual Hazardous Air Pollutant (HAP) to less than 9.0 tons per 12-month rolling time period and aggregate HAPs to less than 22.5 tons per 12-month rolling time period. It also requires tracking of HAPs for each material used. This is being done as required. The highest individual HAP emission is xylene at 0.59 tons per 12-month rolling period ending in September 2016. The total reported aggregate HAP emission rate is 0.90 tons per 12-month rolling time period ending in September 2016.

COMPLIANCE SUMMARY

Harlo Products Corporation was in compliance at the time of the inspection.

NAME 

DATE 11-7-16

SUPERVISOR 