DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Off-site Inspection

B888756356

FACILITY: HARLO CORPORATION		**SRN / ID:** B8887
LOCATION: 4210 Ferry Street, SW, GRANDVILLE		**DISTRICT:** Grand Rapids
CITY: GRANDVILLE		**COUNTY:** KENT
CONTACT: Mike Birkmeier , Chief Operating Officer		**ACTIVITY DATE:** 11/19/2020
STAFF: Adam Shaffer	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Partial Compliance Evaluation - Records review		
RESOLVED COMPLAINTS:		

A partial compliance evaluation (PCE) was completed by Air Quality Division (AQD) staff Adam Shaffer (AS) for Harlo Products Corporation (HP) by requesting applicable records on November 19, 2020, to verify compliance with Permit to Install (PTI) No. 141-04A. A site inspection to verify compliance will be completed at a later date. Prior to the records request several phone calls were made with HP staff and it was determined that the Control Panel production area previously mentioned in the 2016 inspection report to have two paint booths that appeared to be exempt per Rule 287(2)(c) had been shut off in 2016 but the equipment was still located onsite. During a review of the most recently submitted 2019 Michigan Air Emissions Reporting System (MAERS) Report no usage was reported for this process.

Facility Description

HP is a forklift production company that appears to consist of several different business units that are in operation under PTI No. 141-04A. The facility is an opt out source for hazardous air pollutants (HAPs).

Offsite Compliance Review

Based on the timing of the inspection, the 2019 MAERS Report had already been received with the 2020 MAERS Report not having been submitted yet. Upon review of the 2019 MAERS Report, no usages were reported for the Alana metal paint application area, which would be the Control Panel production area as previously mentioned. For 2019, the facility reported 12,951.70 lbs of volatile organic compound (VOC) emissions. Upon review of requested records, emissions were similar to what was reported.

Records Compliance Evaluation

A request was sent to Mr. Mike Birkmeier, Chief Operating Officer, of HP on November 19, 2020, for various records required by PTI No.141-04A.

PTI No. 141-04A

EU-ContPanel#1 and EU-ContPanel#2

These two emission units are miscellaneous metal parts paint spray booths equipped with dry filters for particulate overspray. As previously mentioned, these were stated by Mr. Birkmeier to have been shut down since 2016, but the equipment is still located onsite. Since it would appear the units have not been in operation for several years, applicable records were not requested.

EU-MatHandling#1

This emission unit is a miscellaneous metal parts paint spray booth equipped with dry filters for particulate overspray.
This emission unit is subject to a monthly VOC emission limit of one ton. Records were requested and reviewed back through November 2019. Since November 2019, the highest monthly reported VOC emissions was 1,003.2 lbs, which is well within the permitted monthly limit.
This emission unit is subject to a second VOC emission limit of 10.0 tons per year (tpy) per a 12-month rolling time period. Records were requested and reviewed since November 2019. As of October 2020, 3.59 tpy of VOC emissions were emitted per a 12-month rolling time period. Previous 12-month rolling time periods reviewed were also within the permitted limit.
Per Special Condition (SC) 1.7, the VOC content of any coating, reducer, catalyst, additive, purge solvent, and cleanup solvent used shall be determined using EPA Test Method 24, or manufacturers formulation data upon request and approval by the AQD District Supervisor. Based on the 2016 inspection, a request had been made to utilize manufacturer's formulation data by the company in 2008 and was later approved by the AQD. Additionally, during the previous inspection it had been explained to HP staff the difference between safety data sheets and formulation data. A request was made for formulation data for the top three used materials for this emission unit. Upon review of the records received it was concluded that HP is using environmental data sheets and safety data sheets to determine VOC content for select materials. The safety data sheets, however, did include EPA Test Method 24 VOC content. After further review this was determined to be acceptable at this time; however, moving forward formulation data shall be used to determine VOC content for materials used in this emission unit. In follow up discussion with HC staff and their consultant it appears that the materials associated with the safety data sheets provided are no longer used during onsite operations.
Per SC 1.10, HP shall keep track of gallons of each coating, reducer, catalyst, and additive used, VOC content, VOC monthly / 12-month rolling time periods emissions and hours of operation. Records were requested and reviewed back through November 2019. After further review, HP overall appears to be keeping track of usage rates, hours of operation, and emissions based on a monthly / 12-month rolling time period. Reclaim of materials is accounted for and based on the calculations could potentially result in underestimating emissions. After further review and based on how low the reported emissions are, it is highly unlikely to cause an emissions exceedance. The method to properly apply reclaim to reported emissions moving forward was discussed with HP's consultant.
Per SC 1.11, HP shall keep track of solvent usage rates, reclaim if applicable, VOC contents and monthly / 12-month rolling time period emissions. Records were requested and reviewed back through November 2019. After further review, HP overall appears to be keeping track of usage rates, and emissions based on a monthly / 12-month rolling time period. As stated previously, reclaim was discussed with HP's consultant moving forward on how to correctly apply to reported emissions.

EU-MatHandling#2

This emission unit is a miscellaneous metal parts paint spray booth equipped with dry filters for particulate overspray.
This emission unit is subject to a monthly VOC emission limit of one ton. Records were requested and reviewed back through November 2019. Since November 2019, the highest monthly reported VOC emissions was 820.8 lbs, which is well within the permitted monthly limit.

This emission unit is subject to a second VOC emission limit of 10.0 tpy per a 12-month rolling time period. Records were requested and reviewed since November 2019. As of October 2020, 2.93 tpy of VOC emissions were emitted per a 12-month rolling time period. Previous 12-month rolling time periods reviewed were also within the permitted limit.
Per SC 2.7, the VOC content of any coating, reducer, catalyst, additive, purge solvent, and cleanup solvent used shall be determined using EPA Test Method 24, or manufacturers formulation data upon request and approval by the AQD District Supervisor. Based on the 2016 inspection, a request had been made to utilize manufacturer's formulation data by the company in 2008 and was later approved by the AQD. A request was made for formulation data for the top three used materials for this emission unit. Upon review of the records received it was concluded that HP is using environmental data sheets and safety data sheets to determine VOC content for select materials. The safety data sheets, however, did include EPA Test Method 24 VOC content. After further review this was determined to be acceptable at this time, however, moving forward formulation data shall be used to determine VOC content for materials used in this emission unit. In follow up discussion with HC staff and their consultant it appears that the materials associated with the safety data sheets provided are no longer used during onsite operations.
Per SC 2.10, HP shall keep track of gallons of each coating, reducer, catalyst, and additive used, VOC content, VOC monthly / 12-month rolling time periods emissions and hours of operation. Records were requested and reviewed back through November 2019. After further review, HP overall appears to be keeping track of usage rates, hours of operation, and emissions based on a monthly / 12-month rolling time period. Reclaim of materials is accounted for and based on the calculations could potentially result in underestimating emissions. After further review and based on how low the reported emissions are, it is highly unlikely to cause an emissions exceedance. The method to properly apply reclaim to reported emissions moving forward was discussed with HP's consultant.
Per SC 2.11, HP shall keep track of solvent usage rates, reclaim if applicable, VOC content and monthly / 12-month rolling time period emissions. Records were requested and reviewed back through November 2019. After further review, HP overall appears to be keeping track of usage rates, and emissions based on a monthly / 12-month rolling time period. As stated previously, reclaim was discussed with HP's consultant moving forward on how to correctly apply to reportable emissions.

FGFACILITY

The flexible group applies to all site-wide equipment.
The flexible group is subject to an individual HAP emission limit of less than 9.0 tpy per a 12 -month rolling time period and an aggregate HAP emission limit of less than 22.5 tpy per a 12-month rolling time period. For the month of October 2020, 262.6 lbs of aggregate HAPs were emitted. As of October 2020, 1.35 tpy of aggregate HAPs were emitted which is within the permitted limit for both individual and aggregate HAPs. Previous 12-month rolling time periods reviewed were also well within the permitted emission limits.
Per SC 3.2, manufacturer's formulation data shall be used to determine HAP content for each material used. During the previous inspection, it was discussed at length the difference of safety data sheets and formulation data. Formulation data was requested for the top five used materials that contain HAPs. Upon review of the records received it was concluded that HP is using environmental data sheets and safety data sheets to determine HAP content for select materials. This is a violation of PTI No. 141-04A, FGFACILITY, SC 3.2. It was noted that based on how low HAP emissions are for this flexible group it is highly unlikely that the HAP emission limits were exceeded. In follow up discussion with HC staff

and their consultant it appears that the materials associated with the safety data sheets provided are no longer used during onsite operations.
Per SC 3.4, HP shall keep track of usage rates, any reclaim of materials if applicable, HAP content for each material, and individual and aggregate HAP emissions based on monthly / 12-month rolling time period. Records were requested and provided for select months. Upon review of the records provided, it appears that HP is keeping track of usage rates, reclaim, and monthly / 12-month rolling time period HAP emissions. As stated previously, based on the reclaim calculations HP is potentially underestimating reportable emissions. This was discussed with HP's consultant on how to correctly apply reclaim to reported emissions moving forward.

Conclusion

Based on a review of the records provided, HP appears to not be in compliance with PTI No. 141-04A. A violation notice (VN) will be sent for the following violation.

- HP is using safety data sheets to determine the HAP content for select materials. This is a violation of PTI No. 141-04A, FGFACILITY, SC 3.2.

NAME Adam Shaffer DATE 12/16/2020 SUPERVISOR HH