

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

B888756366

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: 12/16/2020
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Partial Compliance Evaluation - Virtual Inspection		
RESOLVED COMPLAINTS:		

An offsite inspection was completed by Air Quality Division (AQD) staff Adam Shaffer (AS) for Harlo Products Corporation (HP) by conducting a virtual inspection of the facility on December 16, 2020, to verify compliance with Permit to Install (PTI) No. 141-04A and applicable air pollution control rules.

Facility Description

HP is a forklift production company that consists 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). Most production of products (forklifts) is for the agricultural and construction business areas.

Offsite Compliance Review

A records request for applicable records associated with PTI No. 141-04A had previously been made on November 19, 2020. Upon review of the records provided, it had been identified that HP was using safety data sheets to determine the HAP contents for select materials. This is a violation of PTI No. 141-04A, FGFACILITY, Special Condition (SC) 3.2 and a Violation Notice, dated December 16, 2020, was issued to HP.

Offsite Inspection

Due to the ongoing coronavirus pandemic, the intent to complete a virtual inspection of the facility instead of an in-person inspection was announced to HP staff on December 14, 2020. A "test drive" was completed on December 15, 2020, to verify that visual technology for the virtual inspection could be used with no major issues. The virtual inspection of the facility was completed the afternoon of December 16, 2020. Mr. Mike Birkmeier, Chief Operating Officer, provided the virtual inspection of the facility, and answered site specific questions.

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. Both booths were observed during the course of the inspection and verified to be in storage and not currently used. Additionally, though not part of the emission units, there were three associated wash bays prior to coating that were also noted to no longer be in operation.

EU-MatHandling#1 and EU-MatHandling#2

These two emission units are miscellaneous metal parts paint spray booths equipped with dry filters for particulate overspray. Since both booths are similar in nature with the same conditions applying to each booth, they will be combined in this inspection report.

Both spray booths were observed during the course of the inspection. Each booth consists of a single paint booth chamber. Dry filters for each paint booth were observed. Minor air gaps were noted, and HP staff were advised to limit those gaps in order to catch excess fugitive spray from coating operations. Overall, the filters appeared to be in good condition. HP staff stated that filters are changed 1-2 times a week depending on the usage. Speaking with HP staff, spent filters are disposed of offsite. One manual spray applicator was noted for each booth and is flushed with solvent after each coating change. HP utilizes high volume low pressure (HVLP) spray technology. HP staff were unsure if test caps were available onsite, and it was advised to make sure test caps are available onsite. Containers of materials used for the spray booths were observed adjacent to each booth. Overall, HP is keeping containers closed. It was advised to HP staff that the few containers noted to be open be kept sealed when not in operation.

One stack is listed in association with each respective paint booth. The stacks were not observed during the inspection; however, no issues were noted during the last inspection and HP staff stated that no changes have occurred to the stacks since the last inspection.

Additional Observations

- A separate wash bay and Hotsy (small, heated parts washer) are located next to each of the two active spray booths. Each wash bay is vented internally, and the vent located on the Hotsy appears to be for the natural gas combustion gases when the unit is heated. One material noted for the wash bay was an etching material. The wash bay and Hotsy appear to be exempt per Rule 285(2)(r).
- Welding stations were noted during the course of the inspection that appear to be exempt per Rule 285(2)(i).
- A general maintenance area was observed during the inspection. One parts washer was noted in the maintenance area. The parts washer was closed, appeared to be less than ten square feet, and would appear to be exempt per Rule 281(2)(h).
- Various metal fabrication equipment was observed during the course of the inspection that appears to be exempt per Rule 285(2)(l)(vi)(B).
- One plasma cutting operation was observed during the inspection for cutting metal where standing fans are used to blow any emissions during operation to what appeared to be an old wash bay that has an external exhaust fan. At the time of the inspection, the facility is planning on installing a fume collector for the plasma cutter around the start of 2021. Per recent internal AQD discussions it has been determined that plasma cutting operations may require a permit to install. Discussions are ongoing and HP will be informed by the AQD if further actions are necessary.
- Following the coating booths, the parts are allowed to dry and then the units are assembled.
- An old storage / mixing paint area was observed during the inspection. HP was in the process of cleaning up the area of old prior spills. Previously, HP's consultant had stated that the paint system installed in the mixing room would be exempt per Rule 287(2)(k). After further review, this appears applicable.

Conclusion

HP is not in compliance with PTI No. 141-04A based on a previous records request. As mentioned earlier in this report a VN dated December 16, 2020, was issued to HP. Refer to the inspection report dated November 19, 2020 for additional information.

Based on this inspection, HP appears to be in compliance with onsite requirements related to PTI No. 141-04A and applicable air pollution control rules.

NAME Adam ShafferDATE 12/29/20SUPERVISOR HH