

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

B888766277

FACILITY: HARLO CORPORATION		SRN / ID: B8887
LOCATION: 4210 Ferry Street, SW, GRANDVILLE		DISTRICT: Grand Rapids
CITY: GRANDVILLE		COUNTY: KENT
CONTACT: Anthony Corey , Facilities Supervisor		ACTIVITY DATE: 01/12/2023
STAFF: Michael Cox	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Michael Cox (MTC) arrived at the Harlo Corporation (HP) facility located at 4210 Ferry Street SW, Grandville, MI on January 12, 2023, at approximately 8:30am to complete a scheduled unannounced inspection to verify the facility's compliance with Permit to Install (PTI) No. 141-04A and all other applicable air pollution control rules. Prior to entering the facility, offsite odors and emission observations were completed. No odors or visible emissions were observed in the area. Upon arrival onsite, AQD staff MTC met with Mr. Anthony Corey, Facilities Supervisor, who provided a walkthrough of the facility, answered site specific questions, and provided records requested during the inspection.

#### Facility Description

HP is a rough terrain forklift production company that is in operation under PTI No. 141-04A. The facility is an opt-out source for hazardous air pollutants (HAPs). Most of the forklifts produced by the facility is for agricultural and construction businesses.

#### Compliance Evaluation:

##### 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. Both paint booths were listed as exempt in PTI No. 141-04A from Rule 201 permitting per Rule 287 but were listed in the PTI due to their inclusion for the Title V HAPs opt-out permit conditions. These emission units were noted to have been shut down in 2016 and are now used as an office and storage area. Additionally, associated wash bays prior to coating that were also noted to be no longer be in operation are now used as storage areas.

##### 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 in place. 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 for their paint spray application. 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 next to each booth including clean-up solvents. The containers were noted to be kept closed as required.

EU-MatHandling#1 and EU-MatHandling#2 are limited to 2000 pounds per calendar month and 10.0 tons per year of VOC emissions based on a 12-month rolling time period each. However, since the EUs are identical in the permit, they are combined for purposes of this report. Records of the facility's VOC and HAP containing materials along with emission records were requested and provided for the time period of January 1, 2022, through January 12, 2023. The highest emission rate on a monthly basis was noted to be 1,152.9 pounds of VOC emissions combined from both emission units that occurred during the month of July 2022, which is below the permitted limit. The highest 12-consecutive month VOC emissions occurred during 12-month period ending in October 2022, when 4.69 tons of VOC were emitted from both emission units combined. A letter dated November 10, 2016 was sent to HP to approve the use of formulation data. Formulation data and usage records were requested and provided. After a review of the records, all calculations were accurate and up to date with no issues noted.

One stack is listed in association with each respective paint booth. The two stacks were observed venting unobstructed vertically. The stacks appeared to be consistent with the dimensions listed in PTI No. 141-04A.

#### FGFACILITY:

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. HAP emissions records were requested and reviewed for the time period of January 1, 2022, through January 12, 2023. The highest 12-consecutive month individual HAP emission was noted to be 3,294.36 pounds (1.65 tons) of toluene, which occurred during the 12-month period ending in December 2022. The highest 12-consecutive month aggregate HAP emission was noted to be 4,396.5 pounds (2.20 tons) of HAPs, which occurred during the 12-month rolling period ending in December 2022. Based on the review of the records, it appears that HP is adequately tracking HAP usage and calculating HAP emissions as required.

#### **Additional Observations**

- A wash bay and Hotsy, which is a small, heated parts washer, are located next to each of the two active spray booths (EUMatHandling#1 and EUMatHandling#2). 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. The wash bay and Hotsy

appear to be exempt from Rule 201 permitting 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 which appears to be exempt from Rule 201 permitting per Rule 285(2)(l)(vi)(B).
- An old storage / mixing paint area was observed during the inspection. This area appears to be exempt from Rule 201 permitting per Rule 287(2)(k). After further review, this appears applicable.

### Conclusion

Based on the observation made during the facility walk-through and the records reviewed, HP appears to be in compliance with PTI No. 141-04A and all other applicable State and Federal air quality rules and regulations.

NAME Michael T. Cox

DATE 2/7/2023

SUPERVISOR

