

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY GRAND RAPIDS DISTRICT OFFICE



KEITH CREAGH DIRECTOR

May 17, 2016

Mr. Bruce E. Morgan HarbisonWalker International 1305 Cherrington Parkway, Suite 100 Moon Township, Pennsylvania 15108

SRN: B5777, Newaygo County

Dear Mr. Morgan:

VIOLATION NOTICE

On May 13, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), completed the review of the Rule 912 Notification dated April 27, 2016 for HarbisonWalker International located at 1301 East 8th Street, White Cloud, Michigan. The purpose of this Rule 912 Notification was to report an abnormal operating condition at HarbisonWalker. The review was conducted to determine HarbisonWalker's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the conditions of Permit to Install (PTI) number 24-10.

During the review of the April 27, 2016 Rule 912 Notification document, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|--|---|
| EU-BrickOvens | PTI No. 24-10, Special Condition (SC) I.1 | Exceeded hourly VOC emission limit |
| EU-BrickOvens | PTI No. 24-10, SC IV.1 | Failure to properly maintain and operate the catalytic oxidizer |

The records provided demonstrate that estimated actual emissions of Volatile Organic Compounds from the process were 8 pounds during the abnormal operating conditions. This exceeded the allowable pounds per hour emission limit in PTI No. 24-10, SC I.1 of 0.55 pounds per hour.

Additionally, the abnormal operating conditions were caused by a catalytic oxidizer that was not being operated and maintained in accordance with PTI No. 24-10, SC IV.1.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 7, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If HarbisonWalker believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

April Lazzaro Senior Environmental Quality Analyst Air Quality Division 616-356-0248

cc: Ms. Prudy Blue, DEQ cc/via email: Ms. Lynn Fiedler, DEQ Ms. Teresa Seidel, DEQ Ms. Heidi Hollenbach, DEQ Mr. Thomas Hess, DEQ